

Serial: NPD-NRC-2018-006
April 10, 2018

10 CFR 52.97

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Frederick D. Brown
Director, Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**LEVY NUCLEAR PLANT, UNITS 1 AND 2
COMBINED LICENSE NOS. NPF-99 AND NPF-100
DOCKET NOS. 52-029 AND 52-030**

**WILLIAM STATES LEE III NUCLEAR STATION, UNITS 1 AND 2
COMBINED LICENSE NOS. NPF-101 AND NPF-102
DOCKET NOS. 52-018 AND 52-019**

SUBJECT: Duke Energy Submittal of Schedule for Implementation of Operational Programs
and Other License Conditions

Reference: Letter from Joseph W. Donahue (Duke Energy) to U.S. Nuclear Regulatory
Commission (NRC), dated October 12, 2017, "Duke Energy Submittal of
Schedule for Implementation of Operational Programs and Other License
Conditions," Serial: NPD-NRC-2017-016 (ML17289A211)

The U.S. Nuclear Regulatory Commission (NRC) issued Combined Licenses (COLs) NPF-99 and NPF-100 to Duke Energy Florida, LLC (DEF) for Levy Nuclear Plant (LNP), Units 1 and 2 pursuant to Title 10 of the Code of Federal Regulations (10 CFR) Section 52.97, "Issuance of combined licenses," on October 26, 2016. The NRC issued COLs NPF-101 and NPF-102 to Duke Energy Carolinas, LLC (DEC) for William States Lee III Nuclear Station (WLS) Units 1 and 2 pursuant to 10 CFR Section 52.97, "Issuance of combined licenses," on December 19, 2016. DEF and DEC, henceforth collectively referred to as "Duke Energy", are required to submit, no later than 12 months after issuance of the COL and updated every 6 months until 12 months before scheduled fuel loading, the following in accordance with License Condition 2.D.(11):

- A schedule for implementation of the operational programs listed in Final Safety Analysis Report Table 13.4-201, including the associated estimated date for initial loading of fuel.
- A schedule for completion of or implementation of the items specified in COL Section 2.D.(11)(a) through (i).

The LNP Units 1 and 2 implementation schedule is provided in Enclosure 1 and the WLS Units 1 and 2 implementation schedule is provided in Enclosure 2. Since Duke Energy has not yet made a decision to construct the LNP and WLS units, there are no scheduled dates for the various programs and other items listed, including the estimated date for initial loading of fuel. Therefore, the scheduled implementation dates for the operational programs and other items are designated as "To Be Determined" (TBD) with the exception of the Quality Assurance

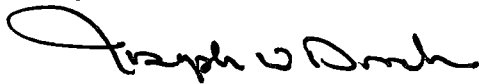
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Program. The Quality Assurance Program has been implemented for LNP, Units 1 and 2 and WLS, Units 1 and 2. When Duke Energy makes a decision to construct LNP and/or WLS, a detailed schedule will be developed for the applicable units, including implementation dates for the operational programs and other license conditions.

This letter contains no regulatory commitments.

If you have any questions, or need additional information, please contact me or Erik Wagner at (704) 382-3949.

Sincerely,



Joseph W. Donahue
Vice President - Nuclear Engineering

Enclosures:

1. Levy Nuclear Plant, Units 1 and 2, Combined License Operational Programs and Other License Conditions Implementation Schedule
2. William States Lee III Nuclear Station, Units 1 and 2, Combined License Operational Programs and Other License Conditions Implementation Schedule

cc : U.S. NRC Region II, Regional Administrator
Mr. Brian Hughes, U.S. NRC Project Manager

**LEVY NUCLEAR PLANT,
UNITS 1 AND 2**

**Combined License Operational Programs and Other License
Conditions Implementation Schedule**

(6 pages including cover page)

Levy Nuclear Plant, Units 1 and 2
Combined License Operational Programs and Other License Conditions Implementation Schedule

COL Reference FSAR Reference	Program Name	Scheduled Implementation Date	
		Unit 1	Unit 2
<u>2.D.(11)</u> N/A	Initial Fuel Load	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 1	Inservice Inspection	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 2	Inservice Testing	TBD	TBD
<u>2.D.(10)(a) and 2.D.(11)</u> Table 13.4-201 Item 3	Environmental Qualification	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 4	Preservice Inspection	TBD	TBD
<u>2.D.(10)(b) and 2.D.(11)</u> Table 13.4-201 Item 5	Reactor Vessel Material Surveillance	TBD	TBD
<u>2.D.(10)(c) and 2.D.(11)</u> Table 13.4-201 Item 6	Preservice Testing	TBD	TBD
<u>2.D.(10)(d) and 2.D.(11)</u> Table 13.4-201 Item 7	Containment Leakage Rate Testing	TBD	TBD
<u>2.D.(10)(e)1 and 2.D.(11)</u> Table 13.4-201 Item 8	Fire Protection – Designated Storage Areas (per RG 1.189)	TBD	TBD
<u>2.D.(10)(e)2 and 2.D.(11)</u> Table 13.4-201 Item 8	Fire Protection – New Fuel Areas (per RG 1.189)	TBD	TBD
<u>2.D.(10)(e)3 and 2.D.(11)</u> Table 13.4-201 Item 8	Fire Protection – All other features	TBD	TBD
<u>2.D.(10)(f) and 2.D.(11)</u> Table 13.4-201 Item 9	Radiological Effluent Technical Specifications / Standard Radiological Effluent Controls	TBD	TBD
<u>2.D.(10)(g) and 2.D.(11)</u> Table 13.4-201 Item 9	Offsite Dose Calculation Manual	TBD	TBD

Levy Nuclear Plant, Units 1 and 2
Combined License Operational Programs and Other License Conditions Implementation Schedule

COL Reference FSAR Reference	Program Name	Scheduled Implementation Date	
		Unit 1	Unit 2
<u>2.D.(10)(h) and 2.D.(11)</u> Table 13.4-201 Item 9	Radiological Environmental Monitoring	TBD	TBD
<u>2.D.(10)(i) and 2.D.(11)</u> Table 13.4-201 Item 9	Process Control	TBD	TBD
<u>2.D.(10)(i)1 and 2.D.(11)</u> Table 13.4-201 Item 10	Radiation Protection Program: Prior to Initial Receipt of Byproduct, Source, or Special Nuclear Materials	TBD	TBD
<u>2.D.(10)(i)2 and 2.D.(11)</u> Table 13.4-201 Item 10	Radiation Protection Program: Prior to Receipt of Fuel Onsite	TBD	TBD
<u>2.D.(10)(i)3 and 2.D.(11)</u> Table 13.4-201 Item 10	Radiation Protection Program: Prior to Initial Fuel Load	TBD	TBD
<u>2.D.(10)(i)4 and 2.D.(11)</u> Table 13.4-201 Item 10	Radiation Protection Program: Prior to Shipment of Radioactive Waste	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 11	Non Licensed Plant Staff Training (portions applicable to radioactive material)	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 11	Non Licensed Plant Staff Training (all portions)	TBD	TBD
<u>2.D.(10)(k) and 2.D.(11)</u> Table 13.4-201 Item 12	Reactor Operator Training	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 13	Reactor Operator Requalification	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 14	Emergency Planning: Full Participation Exercise	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 14	Emergency Planning: Onsite Exercise	TBD	TBD

Levy Nuclear Plant, Units 1 and 2
Combined License Operational Programs and Other License Conditions Implementation Schedule

COL Reference FSAR Reference	Program Name	Scheduled Implementation Date	
		Unit 1	Unit 2
<u>2.D.(11)</u> Table 13.4-201 Item 14	Emergency Planning: Detailed Implementing Procedures for Emergency Plan	TBD	TBD
<u>2.D.(10)(o) and 2.D.(11)</u> Table 13.4-201 Item 15	Physical Protection Program for SNM prior to protected area being declared operational	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 15	Physical Security Program	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 15	Safeguards Contingency Program	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 15	Security Training and Qualification Program	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 16	Quality Assurance Program – Operation	Implemented	Implemented
<u>2.D.(11)</u> Table 13.4-201 Item 17	Maintenance Rule	TBD	TBD
<u>2.D.(10)(l) and 2.D.(11)</u> Table 13.4-201 Item 18	Motor-Operated Valve Testing	TBD	TBD
<u>2.D.(10)(m)1 and 2.D.(11)</u> Table 13.4-201 Item 19	Initial Test Program - Construction	TBD	TBD
<u>2.D.(10)(m)2 and 2.D.(11)</u> Table 13.4-201 Item 19	Initial Test Program – Pre-operational	TBD	TBD
<u>2.D.(10)(m)3 and 2.D.(11)</u> Table 13.4-201 Item 19	Initial Test Program - Startup	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 20	Fitness for Duty (FFD) for Construction (workers and first-line supervisors)	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 20	FFD for Construction (management and oversight personnel)	TBD	TBD

**Levy Nuclear Plant, Units 1 and 2
Combined License Operational Programs and Other License Conditions Implementation Schedule**

COL Reference FSAR Reference	Program Name	Scheduled Implementation Date	
		Unit 1	Unit 2
<u>2.D.(11)</u> Table 13.4-201 Item 20	FFD for Security Personnel	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 20	FFD for Operations Security Personnel	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 20	FFD for FFD Program personnel	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 20	FFD for persons required to physically report to the Technical Support Center (TSC) or Emergency Operations Facility (EOF)	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 20	FFD for Operation	TBD	TBD
<u>2.D.(11)</u> Table 13.4-201 Item 21	Cyber Security	TBD	TBD
<u>2.D.(10)(n) and 2.D.(11)</u> Table 13.4-201 Item 22	Special Nuclear Material Control and Accounting	TBD	TBD
<u>LC 2.D.(11)(a)</u> Section 3.8.4.8	Construction and Inspection Procedures for Steel Concrete Composite	TBD	TBD
<u>LC 2.D.(11)(b)</u> N/A	Spent Fuel Rack Metamic Coupon Monitoring Program	TBD	TBD
<u>LC 2.D.(11)(c)</u> N/A	Flow Accelerated Corrosion Program (including construction phase)	TBD	TBD
<u>LC 2.D.(11)(d)</u> Section 10.2.3.6	Turbine Maintenance and Inspection Program	TBD	TBD
<u>LC 2.D.(11)(e)</u> N/A	Availability of documented instrumentation uncertainties to calculate a power calorimetric uncertainty	TBD	TBD

Levy Nuclear Plant, Units 1 and 2
Combined License Operational Programs and Other License Conditions Implementation Schedule

<u>COL Reference</u> <u>FSAR Reference</u>	Program Name	Scheduled Implementation Date	
		Unit 1	Unit 2
<u>LC 2.D.(11)(f)</u> N/A	Availability of administrative controls to implement maintenance and contingency activities related to the power calorimetric uncertainty instrumentation	TBD	TBD
<u>LC 2.D.(11)(g)</u> N/A	Site-specific severe accident management guidelines	TBD	TBD
<u>LC 2.D.(11)(h)</u> N/A	The operational and programmatic elements of the mitigative strategies for responding to circumstances associated with the loss of large areas of the plant due to explosions or fire	TBD	TBD
<u>LC 2.D.(11)(i)</u> Section 14.2.3	Site-specific startup administrative manual	TBD	TBD
<u>LC 2.D.(11)(i)</u> Section 14.2.3	Pre-operational testing procedures	TBD	TBD
<u>LC 2.D.(11)(i)</u> Section 14.2.3	Startup testing procedures	TBD	TBD

Note: TBD = To Be Determined

**WILLIAM STATES LEE III NUCLEAR STATION,
UNITS 1 AND 2**

**Combined License Operational Programs and Other License
Conditions Implementation Schedule**

(6 pages including cover page)

William States Lee III Nuclear Station, Units 1 and 2
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<u>2.D.(11)</u> Table 13.4-201 Item 1	Inservice Inspection	TBD	TBD
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<u>2.D.(11)</u> Table 13.4-201 Item 14	Emergency Planning: EPZ population change review	TBD	TBD
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<u>LC 2.D.(11)(a)</u> Section 3.8.4.8	Construction and Inspection Procedures for Steel Concrete Composite	TBD	TBD
<u>LC 2.D.(11)(b)</u> N/A	Spent Fuel Rack Metamic Coupon Monitoring Program	TBD	TBD
<u>LC 2.D.(11)(c)</u> N/A	Flow Accelerated Corrosion Program (including construction phase)	TBD	TBD
<u>LC 2.D.(11)(d)</u> Section 10.2.3.6	Turbine Maintenance and Inspection Program	TBD	TBD

**William States Lee III Nuclear Station, Units 1 and 2
 Combined License Operational Programs and Other License Conditions Implementation Schedule**

<u>COL Reference</u> <u>FSAR Reference</u>	Program Name	Scheduled Implementation Date	
		Unit 1	Unit 2
<u>LC 2.D.(11)(e)</u> N/A	Availability of documented instrumentation uncertainties to calculate a power calorimetric uncertainty	TBD	TBD
<u>LC 2.D.(11)(f)</u> N/A	Availability of administrative controls to implement maintenance and contingency activities related to the power calorimetric uncertainty instrumentation	TBD	TBD
<u>LC 2.D.(11)(g)</u> N/A	Site-specific severe accident management guidelines	TBD	TBD
<u>LC 2.D.(11)(h)</u> N/A	The operational and programmatic elements of the mitigative strategies for responding to circumstances associated with the loss of large areas of the plant due to explosions or fire	TBD	TBD
<u>LC 2.D.(11)(i)</u> Section 14.2.3	Site-specific startup administrative manual	TBD	TBD
<u>LC 2.D.(11)(i)</u> Section 14.2.3	Pre-operational testing procedures	TBD	TBD
<u>LC 2.D.(11)(i)</u> Section 14.2.3	Startup testing procedures	TBD	TBD

Note: TBD = To Be Determined