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June 28, 2006

U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTENTION: Document Control Desk

Subject: Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, 50-270, 50-287
NRC Generic Letter 2004-02, Potential Impact of Debris Blockage on
Emergency Recirculation During Design Basis Accidents at Pressurized-
Water Reactors, Commitment Status Update

On September 13, 2004 the Nuclear Regulatory Commission (NRC) issued Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors." Duke Power, currently Duke Energy Carolinas (Duke) provided the required responses on March 1, 2005 and September 1, 2005.

This letter is provided to give a status of the commitments in the September 1, 2005 submittal. The status is provided in Attachment 1.

If any questions arise or additional information is needed, please contact Mary Shipley at (704) 382-5880.

Very truly yours,

Bruce H. Hamilton
Vice President
Oconee Nuclear Station

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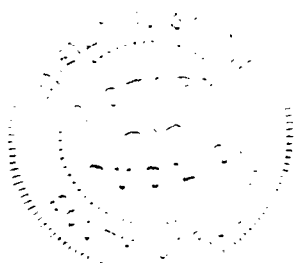
Bruce H. Hamilton, being duly sworn, states that he is Vice President, Oconee Nuclear Site, Duke Energy Corporation, and affirms that he is the person who subscribed his name to the foregoing and that all the statements and matters set forth herein are true and correct to the best of his knowledge.

Bruce Hamilton
Bruce H. Hamilton, Vice President
Oconee Nuclear Site

Subscribed and sworn to before me this 28 day of
June, 2006
Shirley A Smith
Notary Public

My Commission Expires:

6/12/2013



Attachment 1
ONS GL 2004-02 Commitment Status

September 1, 2005 Commitment

1. *A baseline evaluation has been performed for Oconee by ENERCON Services, Inc. This evaluation was performed using the guidance of NEI 04-07, "Pressurized Water Reactor Sump Performance Evaluation Methodology, Revision 0" (NEI 04-07) as amended by the NRC SER for that methodology. The evaluation is currently under review by Oconee and will be complete by June 30, 2006.*

Status

The baseline evaluation for Oconee Nuclear Station has been completed by ENERCON Services, Inc. Owner review and approval of this analysis will be completed by December 31, 2007.

September 1, 2005 Commitment

2. *A downstream effects evaluation will be completed for Oconee by Stone & Webster. This evaluation will be performed using the methodology provided by WCAP-16406-P, "Evaluation of Downstream Sump Debris Effects in Support of GSI 191," (WCAP-16406-P). Some exceptions to the WCAP-16406-P methodology may be taken. The evaluation is currently in progress and will be complete by June 30, 2006. Any additional plant modifications or procedure changes associated with this evaluation will be completed by December 31, 2007.*

Status

The downstream effects analysis for debris has been completed for Oconee by Stone & Webster.

September 1, 2005 Commitment

3. *Chemical effects will be evaluated to confirm that sufficient margin exists in the final sump design to account for this head loss. The evaluation will be complete by June 30, 2006. Any additional plant modifications or procedure changes associated with this evaluation will be completed by December 31, 2007.*

Status

The replacement strainers have been designed with additional margin in an effort to accommodate increased head loss due to chemical effects. Testing and analysis to address chemical effects are not complete. Testing for chemical effects will be performed first quarter of 2007. Upon completion of testing, the results will be evaluated and further actions will be determined.

Downstream chemical effects are still under investigation by the industry with the intent of addressing this issue by December 31, 2007.

Attachment 1
ONS GL 2004-02 Commitment Status

September 1, 2005 Commitment

4. *A modified containment sump strainer and supporting structure will be installed in the fall of 2005 for Oconee Unit 2, the spring of 2006 for Oconee Unit 3 and the fall of 2006 for Oconee Unit 1.*

Status

The modified containment sump strainers have been installed on Units 2 and 3, and will be installed on Unit 1 as committed.

September 1, 2005 Commitment

5. *A walkdown of containment using the guidance of NEI 02-01, "Condition Assessment Guidelines: Debris Sources Inside PWR Containments" was completed for Oconee Unit 3 in the fall of 2004 and a confirmatory walkdown of Unit 1 was completed in the spring of 2005. A similar confirmatory walkdown will be performed for Unit 2 in the fall of 2005.*

Status

The walkdowns were completed as committed.

September 1, 2005 Commitment

6. *The plant labeling process will be enhanced to ensure that any additional labels or signs placed inside containment are evaluated to ensure that potential debris sources are evaluated for impact to RBES/ECCS function. This corrective action will be completed by December 31, 2007.*

Status

The enhancement of the plant labeling process will be completed as committed.

September 1, 2005 Commitment

7. *Enhancements will be made to the Oconee coatings program. These enhancements include: increased programmatic control to clearly document and trend evaluations performed on degraded coatings and to ensure that potential coating debris is evaluated for impact on ECCS and Reactor Building Emergency Sump function. This corrective action will be completed by December 31, 2007.*

Status

This commitment is on track to be completed by December 31, 2007.

September 1, 2005 Commitment

8. *Fibrous insulation installed on the cooling water piping associated with each unit's 'B' Auxiliary Reactor Building Cooling Unit will be removed. This insulation removal is complete for Unit 1. The insulation will be removed in the fall of 2005 for Unit 2 and the spring of 2006 for Unit 3.*

Attachment 1
ONS GL 2004-02 Commitment Status

Status

Fibrous insulation installed on the cooling water piping associated with each units' "B" Auxiliary Reactor Building Cooling Unit has been removed as committed.

September 1, 2005 Commitment

9. *Duke will evaluate the modification process to determine if additional controls are needed in order to maintain the validity of inputs to analyses performed in resolving GSI-191 concerns. This evaluation will be completed by June 30, 2006.*

Status

This evaluation is complete and the results are documented in the Duke corrective action program.