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July 25, 2007

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

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
NFPA 805 Transition Pilot – Transmittal of Two Draft Oconee Fire PRA
Calculations

By letter dated February 28, 2005, Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC (Duke) informed the NRC of intent to adopt NFPA 805 in accordance with 10 CFR 50.48(c). By letter dated June 8, 2005, NRC provided its response and agreed that Oconee should be the first NFPA 805 Pilot.

The NRC has provided guidance for compliance with 10 CFR 50.48(c). Regulatory Guide 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," provides this guidance. Section 4.3 of RG 1.205 states that;

"The fire PSAs developed by the licensees that participate in the NFPA 805 Pilot Program will be reviewed by the NRC over the course of the program, such that a separate peer review of the fire PSA will not be required."

Accordingly, in support of the NFPA 805 Pilot, please find attached two draft Oconee Fire PRA calculations: The first calculation is OSC-8978 Draft A, "Oconee Fire PRA, Component Selection." The second calculation is OSC-8979, Draft A, "Oconee Fire PRA, Plant Partitioning and Ignition Frequencies." Both calculations contain a methodology section (Section 7) that describes the process for developing the calculation results. These documents are subject to change as the NFPA 805 pilot initiative progresses.

These draft calculations are being provided for review and comment by the staff. Duke recommends that a meeting be held to obtain staff comments and feedback on these draft documents at an appropriate time.

Duke requests that the attachments to this letter be withheld from public disclosure in accordance with 10 CFR 2.390(d)(1). This letter contains no regulatory commitments.

**The attachments to this letter contain sensitive information
Withhold From Public Disclosure Under 10 CFR 2.390(d)(1).
Upon removal of the attachments, this letter is uncontrolled.**

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LRR

If there are any questions regarding this letter, please contact David Goforth at (704) 382-2659.

Sincerely,

A handwritten signature in black ink that reads "Bruce Hamilton". The signature is written in a cursive style with a large, stylized "B" and "H".

Bruce H. Hamilton

Attachments

1. OSC-8978 Draft A, "Oconee Fire PRA, Component Selection."
2. OSC-8979, Draft A, "Oconee Fire PRA, Plant Partitioning and Ignition Frequencies."

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bxc:

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