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February 26, 2010

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C., 20555-001

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Renewed Facility Operating License, DPR-38, DPR-47, and DPR-55
Docket Numbers 50-269, 50-270, and 50-287
Oconee External Flood Revised Commitment

References:

1. NRC Letter From Joseph G. Giitter to Dave Baxter, "Information Request Pursuant to 10 CFR 50.54(f) Related to External Flooding Including Failure of the Jocassee Dam, at Oconee Nuclear Station, Units 1, 2, and 3 (Oconee) (TAC Nos. MD8224, MD8225, and MD8226), dated August 15, 2008
2. Duke Letter From Dave Baxter to NRC Document Control Desk, "Response to 10 CFR 50.54(f) Request [NRC Letter dated August 15, 2008]," dated September 26, 2008

On August 15, 2008, the NRC issued a request for information (Reference 1) pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Section 50.54(f) regarding the protection against external flooding at Oconee including a postulated failure of the Jocassee Dam.

Duke Energy Carolinas, LLC (Duke Energy) provided a response to Reference 1 in a letter dated September 26, 2008, (Reference 2). Attachment 4 of Reference 2 provided four regulatory commitments. The last of the four commitments; to complete the RAC Engineers & Economists (Utah State University) (RAC) risk study, will not be finished by the February, 2010, completion date in Reference 2.

With this letter, Duke Energy revises the above commitment date to November, 2010.

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~~This letter contains security sensitive information.~~
~~Withhold from Public Disclosure under 10 CFR 2.390 (d)(1)~~

In Reference 2, Duke Energy committed to complete a risk study of the Jocassee Dam by RAC Engineers and Economists by February 2010. The scope of the risk study was to provide a quantitative risk analysis of the postulated dam failure modes, determine the resulting breach sizes of the Jocassee and Keowee dams, and use the new HEC-RAS inundation models to determine resulting flood heights at the Oconee Standby Shutdown Facility. Since that time there have been many interactions between Duke and NRC discussing details concerning the dams, their failure modes, flooding scenarios, etc. Many of the same resources necessary to support RAC were also needed to support these NRC interactions. As a result the RAC work is not yet complete.

However, significant progress has been made during this time. The remaining work by RAC will focus on refinement of the site inundation modeling as well as characterizing the uncertainties associated with all the key inputs to ensure the results of the study meet ASME/ANS RA-Sa-2009[1] for external flooding events. In doing so, the completed RAC study will be used to support decisions related to future corrective action plans.

Since this letter contains security sensitive information, Duke hereby requests the NRC withhold the letter from public disclosure pursuant to 10 CFR 2.390 (d)(1), "Public inspections, exemptions, requests for withholding."

If you have any questions on this matter, please contact Bob Meixell, Oconee Regulatory Compliance, at (864) 873-3279.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 26, 2010.

Sincerely,

Dave Baxter, Vice President
Oconee Nuclear Station

[1] Addenda to ASME / ANS RA-S-2008 - Standard for Level 1 / Large Early Release Frequency Probabilistic Risk Assessment for Nuclear Power Plant Applications

bc:

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