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August 16, 2011

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

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
Proposed Exigent Technical Specification (TS) Amendment to TS 3.10.1,
"Standby Shutdown Facility"
License Amendment Request (LAR) No. 2011-09, Supplement 1

On August 12, 2011, Duke Energy Carolinas, LLC (Duke Energy) submitted a License Amendment Request (LAR) to request approval of a one-time exigent change to the Completion Time (CT) of Technical Specification (TS) 3.10.1, Condition F. On August 15, 2011, the NRC requested Duke Energy to revise the significant hazards consideration for the LAR. The revised significant hazards consideration is provided in the Enclosure. Revisions are denoted by revision bars on the right hand side of the page. There are no Regulatory Commitments made by this LAR supplement.

Should you have any questions concerning this information, please call K. R. Alter at (864) 873-3255.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 16, 2011.

Sincerely,

John W. Pitesa
Senior Vice President
Nuclear Operations

Enclosure - Revised Significant Hazards Consideration

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NRR

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xc (with Enclosure and Attachments):

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ENCLOSURE

REVISED SIGNIFICANT HAZARDS CONSIDERATION

Enclosure
Revised Significant Hazards Considerations

Duke Energy has concluded that operation of ONS in accordance with the proposed license amendment does not involve a significant hazards consideration. Duke Energy's conclusion is based upon its evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

Duke Energy requests the Nuclear Regulatory Commission (NRC) to review and approve a one-time extension to the Completion Time for Technical Specification (TS) 3.10.1, Required Action F.1 to allow time for testing fuses in the in-containment Standby Shutdown Facility (SSF) controlled pressurizer heater circuits. Prior to entering the extended completion time, the fuses will be installed and available. The extension will allow Duke Energy to continue to operate ONS Units 1, 2, and 3 while completing fuse testing to demonstrate SSF ASW TS operability. During the extended period of TS SSF inoperability, several compensatory measures will be used to manage risk. Since the SSF is available during the extended completion time and compensatory measures are to be used to manage risk, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No.

This change does not create the possibility of a new or different kind of accident from any accident previously evaluated. No new accident causal mechanisms are created as a result of the NRC granting of this proposed change. The one-time extension to the Completion Time of TS 3.10.1, Required Action F.1 to allow time for testing of the fuses for the in-containment SSF controlled pressurizer heater circuits and return the SSF ASW System to OPERABLE status do not introduce any changes to the plant which will introduce any new or different accident causal mechanisms.

Does the proposed amendment involve a significant reduction in the margin of safety?

Response: No.

The margin of safety is related to the confidence in the ability of the fission product barriers to perform their design functions during and following an accident situation. The Reactor Coolant System is that barrier that is directly associated with this change. The performance of this fission product barrier will not be significantly impacted by the proposed change because the extension of the Completion Time of TS 3.10.1, Required Action F.1 does not introduce any change in performance of those barriers to perform their design functions. The events that will require SSF mitigation have been previously analyzed and do not affect the fission product barriers' ability to perform.