



Scott L. Batson
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Oconee Nuclear Station

Duke Energy
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10CFR50.90

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April 18, 2013

U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Duke Energy Carolinas, LLC
Oconee Nuclear Station, Units 1, 2, and 3
Docket Numbers 50-269, 50-270, and 50-287
Proposed License Amendment Request for the Reactor Vessel Internals Inspection
Plan; LAR Number 2010-06, Supplement 3

References:

1. License Amendment Request for the Reactor Vessel Internals Inspection Plan, dated November 8, 2010.
2. License Amendment Request for the Reactor Vessel Internals Inspection Plan (Supplement 1), dated June 28, 2012.
3. Request for Additional Information (RAI) Related to Reactor Vessel Internals Inspection Plan Based on MRP-227-A, dated February 11, 2013.
4. License Amendment Request for the Reactor Vessel Internals Inspection Plan (Supplement 2), dated March 28, 2013.

On November 8, 2010, Duke Energy Carolinas, LLC (Duke Energy) submitted License Amendment Request (LAR) 2010-06, to amend Renewed Facility Operating Licenses DPR-38, DPR-47, and DPR-55 for Oconee Nuclear Station (ONS), Units 1, 2, and 3. In that submittal, Duke Energy requested that the Nuclear Regulatory Commission (NRC) review and approve a Reactor Vessel (RV) Internals inspection plan based on "Materials Reliability Program: Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227-Rev.0)" published by the Electric Power Research Institute (EPRI) (Reference 1).

Following the original LAR submittal, Duke Energy submitted Supplement 1 on June 28, 2012. On February 11, 2013, Duke Energy received a request for additional information (RAI) associated with Supplement 1 (Reference 3). Duke Energy responded to these RAI items with the exception of RAI item 13 that, as described in the RAI response, was to be sent separately (Reference 4). RAI item 13 requests the submission of information associated with License Amendment Request (LAR) Commitment 1 (Reference 2). This submittal provides the information to address Commitments 1 and 2 from that LAR.

Attachments 4 and 5 to this letter contain proprietary information.
Withhold From Public Disclosure Under 10 CFR 2.390.
Upon removal of Attachments 4 and 5, this letter is uncontrolled.

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The information provided contains AREVA proprietary information and as such, will be presented in both a proprietary and non-proprietary version. Attachments 1 and 2 contain the non-proprietary versions and Attachments 4 and 5 the proprietary versions. Attachment 3 contains the AREVA affidavit requesting the withholding of proprietary information. As noted in this letter as well as on each page of Attachments 4 and 5, that upon removal of the proprietary information, this letter is uncontrolled.

There are no new commitments contained in this document. Any inquiries on this submittal should be directed to Stephen C. Newman, Oconee Regulatory Affairs Group, at (864) 873-4388.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 18, 2013.

Sincerely,



Scott L. Batson
Vice President
Oconee Nuclear Station

Enclosure:

1. Duke Energy Information for Commitments 1 and 2

Attachments:

1. ANP-3186NP, R1 [Non-Proprietary]
2. ANP-3208P, R0 [Non-Proprietary]
3. AREVA Affidavits for ANP-3186NP, R1 and ANP-3208P, R0
4. ANP-3186NP, R1 [Proprietary]
5. ANP-3208P, R0 [Proprietary]

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cc: (w/enclosure/attachments)

Mr. John P. Boska, Senior Project Manager
(by electronic mail only)
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
11555 Rockville Pike
Rockville, MD 20852

Mr. Victor M. McCree, Administrator, Region II
U.S. Nuclear Regulatory Commission
Marquis One Tower
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Mr. Ed Crowe
NRC Senior Resident Inspector
Oconee Nuclear Station

Ms. Susan E. Jenkins, Manager
Radioactive & Infectious Waste Management
SC Dept. of Health and Environmental Control
2600 Bull St.
Columbia, SC 29201

ENCLOSURE

Duke Energy Information for Commitments 1 and 2

I. Commitment 1:

Schedule for Submittal of Applicant/Licensee Action Item 2 from Revision 1 of the NRC SER (for MRP-227, Revision 0).

[RAI Item 13]

[Section 6.3 of ANP-2951, Rev. 2 discussed Applicant/Licensee Action Item 2 of the SE for MRP-227-A regarding whether Tables 4-1 and 4-2 in MRP-189, Rev. 1 and Tables 4-4 and 4-5 in MRP-191 have missed any RVI components that should be within the scope of the LR to support the current review. Commitment No.1 in Attachment 2 of the June 28, 2012, submittal specified the due date for addressing Action Item 2 as May 31, 2013. Please provide this information in response to this RAI, as the NRC staff needs it in order to make a decision on this license amendment.]

Duke Energy Information:

The completion schedule for Action item 2 was discussed with the NRC via conference call on October 9, 2012. As stated by the NRC reviewer on the call, this information would be needed to complete the LAR Safety Evaluation. On October 15, 2012, via email message, Duke Energy provided an anticipated completion schedule for this item.

The purpose of Action Item 2 is to perform a comparison between the ONS RV Internals license renewal (LR) scope and Tables 4-1 and 4-2 in MRP-189, Rev. 1 [vii] (for B&W-designed RV Internals) to satisfy Applicant/Licensee Action Item 2 from Reference iv. This comparison identifies whether the MRP-189, Rev. 1 tables contain all of the RV Internals components that are within the scope of LR for the ONS units.

The information addressing Action Item 2 is provided in Attachment 1 [Non-Proprietary Version] and Attachment 4 [Proprietary Version].

II. Commitment 2:

Schedule for Submittal of Applicant/Licensee Action Item 4 from Revision 1 of the NRC SER (for MRP-227, Revision 0).

Duke Energy Information:

The completion schedule for Action item 4 was discussed with the NRC via conference call on October 9, 2012. On October 15, 2012, via email message, Duke Energy provided an anticipated completion schedule for this item.

The fourth of these applicant/licensee action items is for the applicants/licensees of currently operating B&W NSSS units to confirm that the core support structure (CSS) upper flange weld was stress relieved during the original fabrication of the reactor vessel (RV) in order to confirm the applicability of MRP-227, as approved by the NRC, to their

facility. If the stress relief was not performed, applicants/licensees must inspect this component as a "Primary" inspection category component consistent with the recommendations in MRP-227, as approved by the NRC, for the Westinghouse and Combustion Engineering (CE) upper core support barrel welds.

The information addressing Action Item 4 is provided in Attachment 2 [Non-Proprietary Version] and Attachment 5 [Proprietary Version].

ATTACHMENT 3

AREVA AFFIDAVITS

FOR ANP-3186NP, R1. & ANP-3208P, R0.

AFFIDAVIT

STATE OF NORTH CAROLINA)
) ss.
COUNTY OF MECKLENBURG)

1. My name is Dennis C. Williford. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in the document titled "ANP-3186P, Revision 1, 'ONS License Renewal Scope and MRP-189, Rev. 1 Comparison'," and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information":

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(c) and 6(d) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dennis C. Williford

SUBSCRIBED before me this 14th
day of MARCH 2013.

Thomas A. Casias

Thomas A. Casias
NOTARY PUBLIC, STATE OF NORTH CAROLINA, COUNTY OF MECKLENBURG
MY COMMISSION EXPIRES: 14 December 2014

A F F I D A V I T

STATE OF NORTH CAROLINA)
) ss.
 COUNTY OF MECKLENBURG)

1. My name is Dennis C. Williford. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in the document titled "ANP-3208P, 'Confirmation of Stress Relief for ONS-1, ONS-2, ONS-3, and CR-3 Core Support Shield Upper Flange Welds'," and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

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8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dennis C. Williford

SUBSCRIBED before me this 13th

day of MARCH 2013.

Thomas A. Casias

Thomas A. Casias

NOTARY PUBLIC, STATE OF NORTH CAROLINA, COUNTY OF MECKLENBURG
MY COMMISSION EXPIRES: 14 December 2014