



CHRISTOPHER M. FALLON  
Vice President  
Nuclear Development

Duke Energy  
EC09D/526 South Church Street  
Charlotte, NC 28202

Serial: NPD-NRC-2013-022  
May 13, 2013

10 CFR 52.79

Mailing Address:  
EC09D / P.O. Box 1006  
Charlotte, NC 28201-1006

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

o: 704.382.9248  
c: 704.519.6173  
f: 704.382.2038

christopher.fallon@duke-energy.com

**LEVY NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 52-029 AND 52-030  
SUPPLEMENT 7 TO RESPONSE TO NRC RAI LETTER 108 – IMPLEMENTATION OF  
FUKUSHIMA NEAR-TERM TASK FORCE RECOMMENDATIONS**

- References:
1. Letter from Mark Tonacci (NRC) to John Elnitsky (PEF), dated March 15, 2012, "Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-Term Task Force Recommendations."
  2. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated April 12, 2012, "30-Day Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-012.
  3. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated April 25, 2012, "Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-014.
  4. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated June 19, 2012, "Supplement 1 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-019.
  5. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC), dated August 1, 2012, "Supplement 2 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-029.
  6. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC), dated September 27, 2012, "Supplement 3 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-033.
  7. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC), dated October 15, 2012, "Supplement 4 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-035.

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8. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC) , dated October 31, 2012, "Revised Supplement 4 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2012-036.
9. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC) , dated January 18, 2013, "Supplement 5 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2013-001.
10. Letter from Christopher Fallon (PEF) to Nuclear Regulatory Commission (NRC) , dated April 5, 2013, "Supplement 6 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations," Serial: NPD-NRC-2013-008.

Ladies and Gentlemen:

Duke Energy Florida, Inc. (DEF) hereby submits supplemental response number 7 to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) cited in Reference 1.

The enclosure provides a supplemental response to bullet 3 of NRC question 01.05. The enclosure also identifies associated changes to be included in a future revision of the Levy Nuclear Plant Units 1 and 2 COL application.

If you have any further questions, or need additional information, please contact Bob Kitchen at (704) 382-4046, or me at (704) 382-9248.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 13, 2013

Sincerely,



Christopher M. Fallon  
Vice President  
Nuclear Development

Enclosures:

Supplemental Response

cc : U.S. NRC Region II, Regional Administrator  
Mr. Donald Habib, U.S. NRC Project Manager

**Levy Nuclear Plant Units 1 and 2 (LNP)**  
**Supplement 7 to Response to NRC Request for Additional Information Letter No. 108**  
**Related to Implementation of Fukushima Near Term Task Force Recommendations,**  
**Dated 3/15/2012**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
01.05-1	L-0998 & L-1016	August 1, 2012; NPD-NRC-2012-029 and October 31, 2012; NPD-NRC-2012-036
01.05-1	L-0999 & L-1013	April 25, 2012; NPD-NRC-2012-0014 and September 27, 2012; NPD-NRC-2012-033
01.05-1	L-1000, L-1014, L-1019, L-1029, & L-1042	April 25, 2012; NPD-NRC-2012-0014, September 27, 2012; NPD-NRC-2012-033, January 18, 2013; NPD-NRC-2013-001, April 5, 2013; NPD-NRC-2013-008, and supplemental response enclosed – see following pages
01.05-1	L-1002	June 19, 2012; NPD-NRC-2012-019

**NRC Letter No.:** LNP-RAI-LTR-108

**NRC Letter Date:** March 15, 2012

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 01.05-1

**Text of NRC RAI:**

Subject: Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-term Task Force (NTTF) Recommendations

**Bullet 3**

Provide sufficient reliable instrumentation, able to withstand design-basis natural phenomena, to monitor key spent fuel pool parameters (i.e., water level, temperature, and area radiation levels) from the control room (detailed Recommendation 7.1 - Enclosure 6 of SECY-12-0025).

**DEF RAI ID #: L-1042**

**DEF Response to NRC RAI:**

**Bullet 3**

This response supplements information previously submitted in NPD-NRC-2013-008, "Supplement 6 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations". This response provides additional LNP COLA future revisions to LNP FSAR Table 1.8-201 and to LNP COLA Part 7 related to the LNP departure from DCD Table 3.11-1 (Sheet 14 of 51) as described in NPD-NRC-2013-008. This response also provides left-hand margin annotation designations for the LNP departure from DCD Table 3.11-1 (Sheet 14 of 51) in LNP FSAR Section 3.11 and text being added to LNP FSAR Section 9.1.3.7.D described in NPD-NRC-2013-008.

A future revision of the LNP COLA will reflect the changes discussed in this response.

**Associated LNP COL Application Revisions:**

1. COLA Part 2, FSAR Chapter 1, Table 1.8-201, Summary of FSAR Departures from the DCD, will be revised to add the departure from DCD Table 3.11-1 (Sheet 14 of 51):

Departure Number	Departure Description Summary	FSAR Section or Subsection
LNP DEP 3.11-1	DCD Table 3.11-1 (Sheet 14 of 51) "Envir. Zone" numbers for Spent Fuel Pool Level instruments SFS-JE-LT019A, SFS-JE-LT019B, and SFS-JE-LT019C are revised to be consistent with the location of the instruments.	3.11

2. COLA Part 2, FSAR Section 3.11 will be revised to add a departure from DCD Table 3.11-1 (Sheet 14 of 51) as described in NPD-NRC-2013-008, "Supplement 6 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations". The left-hand margin annotation for this departure will be "LNP DEP 3.11-1".

3. COLA Part 2, FSAR Section 9 will be revised to add text to Section 9.1.3.7.D as described in NPD-NRC-2013-008, "Supplement 6 to Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term Task Force Recommendations". The left-hand margin annotation for this added text will be "LNP SUP 9.1-1".

4. COLA Part 7, Departures and Exemption Requests, will be revised to add the departure from DCD Table 3.11-1 (Sheet 14 of 51):

#### A. STD and LNP Departures

This Departure Report includes deviations in the Levy Nuclear Plant, Units 1 and 2 COLA FSAR from the Tier 2 information in the applicable Design Control Document (DCD), pursuant to 10 CFR Part 52, Appendix D, Section VIII and Section X.B.1.

The following Departures ~~is~~ **are** described and evaluated in detail in this report.

<u>Departure Number</u>	<u>Description</u>
STD DEP 1.1-1	Administrative departure for organization and numbering for the FSAR sections
LNP DEP 3.11-1	Revision of "Envir. Zone" numbers for Spent Fuel Pool Level instruments
STD DEP 8.3-1	Class 1E voltage regulating transformer current limiting features

#### ~~A.1 Departures That Can Be Implemented Without Prior NRC Approval~~

<u>Departure Number</u>	<u>Description</u>
<del>STD DEP 1.1-1</del>	<del>Administrative departure for organization and numbering for the FSAR sections</del>
<del>STD DEP 8.3-1</del>	<del>Class 1E voltage regulating transformer current limiting features</del>

#### Departure Number LNP DEP 3.11-1:

Affected DCD/FSAR Sections: DCD Table 3.11-1 (Sheet 14 of 51)

#### Summary of Departure:

DCD Table 3.11-1 (Sheet 14 of 51) "Envir. Zone" numbers for Spent Fuel Pool Level instruments SFS-JE-LT019A, SFS-JE-LT019B, and SFS-JE-LT019C are changed to correct an inconsistency in the DCD. All 3 instruments currently have a Environmental Zone number of "11". SFS-JE-LT019A is changed to Envir. Zone 6, SFS-JE-LT019B is changed to Envir. Zone 7 and SFS-JE-LT019C is changed to Envir. Zone 6 in DCD Table 3.11-1 (Sheet 14 of 51).

#### Scope/Extent of Departure:

SFS-JE-LT019A is revised to Envir. Zone 6, SFS-JE-LT019B is revised to Envir. Zone 7 and SFS-JE-LT019C is revised to Envir. Zone 6 in DCD Table 3.11-1 (Sheet 14 of 51).



**Departure Justification:**

The actual location of the Spent Fuel Pool Level instruments is not being changed from the designed location in this departure. The environmental zones the instruments are located in are being revised to be consistent with the designed instrument location. The AP1000 SFP level transmitters are located in rooms outside of the Fuel Handling Area in the Auxiliary Building. Per Westinghouse design documents, Spent Fuel Pool Level channels 019A and 019C are in room 12365 and channel 019B is in room 12341. Room 12365 is in Zone 6 on DCD Table 3.D.5-1 (Sheet 2 of 3). Room 12341 is in Zone 7 on DCD Table 3.D.5-1 (Sheet 2 of 3). Based on this information, SFS-JE-LT019A is being changed to Envir. Zone 6, SFS-JE-LT019B is being changed to Envir. Zone 7 and SFS-JE-LT019C is being changed to Envir. Zone 6 in DCD Table 3.11-1 (Sheet 14 of 51).

DCD Table 3.11-1 Environmental Zone numbers for Spent Fuel Pool Level provide a reference to environmental conditions in the associated instrument location correlated to an environmental zone in DCD Table 3D.5-1 for "Normal Operating Environments", DCD Table 3D.5-4 for "Abnormal Operating Environments Outside Containment" and DCD Table 3D.5-5 for "Accident Environments". The environmental qualification of the instrument is consistent with conditions identified for the associated environmental zone. Revising the Spent Fuel Pool Level instruments' environmental zone to accurately reflect their actual location will ensure they are environmentally qualified to function properly during normal, abnormal, and accident conditions.

**Departure Evaluation:**

This Tier 2 departure revises SFS-JE-LT019A Envir. Zone from 11 to 6, SFS-JE-LT019B Envir. Zone from 11 to 7, and SFS-JE-LT019C Envir. Zone from 11 to 6 in DCD Table 3.11-1 (Sheet 14 of 51). This departure does not result in any adverse affects to the SFP level indication design function and does not change the environmental qualification methodology. Therefore, this departure does not:

1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the plant-specific DCD.
2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of an SSC important to safety and previously evaluated in the plant-specific DCD.
3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the plant-specific DCD.
4. Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the plant-specific DCD.
5. Create a possibility for an accident of a different type than any evaluated previously in the plant-specific DCD.
6. Create a possibility for a malfunction of an SSC important to safety with a different result than any evaluated previously in the plant-specific DCD.
7. Result in a design basis limit for a fission product barrier as described in the plant-specific DCD being exceeded or altered.
8. Result in a departure from a method of evaluation described in the plant-specific DCD used in establishing the design bases or in the safety analyses.

This departure does not affect resolution of a severe accident issue identified in the plant-specific DCD. Therefore, this departure has no safety significance.

**NRC Approval Requirement:**

This departure does not require NRC approval pursuant to 10 CFR Part 52, Appendix D, Section VIII.B.5.

**Attachments/Enclosures:**

None