



**Scott L. Batson**  
Vice President  
Oconee Nuclear Station

**Duke Energy**  
ON01VP | 7800 Rochester Hwy.  
Seneca, SC 29672

o: 864.873.3274  
f: 864.873.4208  
Scott.Batson@duke-energy.com

May 15, 2013

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

**SUBJECT:** Duke Energy Carolinas, LLC (Duke Energy)  
Oconee Nuclear Station (Oconee), Units 1, 2 and 3  
Docket Nos. 50-269, 50-270 and 50-287

Closure Options for Generic Safety Issue (GSI)-191, "Assessment of Debris Accumulation on Pressurized-Water Reactor Sump Performance" in resolution of final Issues related to Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors"

By letter dated February 29, 2008, Duke Energy submitted a supplemental response to NRC Generic Letter 2004-02 regarding the status of GL 04-02 Requests for Additional Information (RAIs) and inspection questions. Included in this letter was a commitment to "Evaluate and Respond to NRC Conditions and Limitations of WCAP 16793-NP, rev. 0, 90 days after receipt of final NRC Conditions and Limitations." By letter dated July 1, 2008, the NRC issued a response to Duke Energy's February 29, 2008 summary of the GL 04-02 program. In this letter, the NRC stated:

"We have no further questions at this time regarding your completion of corrective actions for Generic Letter (GL) 2004-02. In large part this conclusion is based on the very low potential debris loading at Oconee, as discussed in your supplemental response."

In a subsequent paragraph, the July 1, 2008, letter from the NRC stated the following:

"As you may be aware, we have not yet issued a final safety evaluation (SE) on WCAP 16793 NP. "Evaluation of Long-Term Cooling Considering Particulate, Fibrous, and Chemical Debris in the Recirculating Fluid." We believe that the likelihood of unacceptable in-vessel debris impact for Oconee is very low because of the low debris loading. However, because your GL 2004-02 response refers to and relies on this topical report, we plan to defer issuance of a closure letter to Oconee for the GL until uncertainties regarding the remaining issues with WCAP-16793 are reduced. You may wait for the issue to be resolved through the WCAP process or may demonstrate that in-vessel downstream effects issues are resolved for Oconee by demonstrating without reference to WCAP-16793 or the NRC staff SE that in-vessel downstream effects have been addressed at Oconee."

ALL  
NRC

Based on the above statement, Duke Energy has chosen to wait until issues associated with WCAP-16793-NP were resolved through the WCAP process to address in-vessel downstream effects evaluation commitment for Oconee.

Duke Energy has selected GSI-191 Closure Option 1 from SECY-12-0093 because it has determined that Oconee Nuclear Station, Units 1, 2, and 3, meets the requirements of 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light-Water Nuclear Power Reactors," based on approved models for analysis and strainer head loss testing. In addition, Duke Energy expects to demonstrate compliance with recently approved models for analysis of in-vessel downstream effects.

Based on the aforementioned statement from the July 1, 2008, letter concerning WCAP-16793-NP and telephone discussions between Duke Energy personnel and NRC staff on April 30, 2013, Duke Energy's understanding is that there are two methods available to Duke Energy to address Closure Option 1 and close-out GSI-191 for Oconee. Duke Energy can; 1) evaluate Oconee against WCAP-16793-NP, revision 2 and associated Safety Evaluation (ML13084A154) limits and restrictions, or 2) demonstrate compliance with 'Clean Plant Criteria' (with additional NRC considerations and clarifications) as reviewed by the NRC in a letter to the Nuclear Energy Institute (NEI) dated May 2, 2012 (ML120730181). Duke Energy is currently evaluating both methods and will clarify the method utilized to closeout GSI-191 in the follow-up letter noted in Attachment 1.

There are no new commitments made herein; however, the completion date for the outstanding commitment to address WCAP 16973-NP and associated NRC SE is revised to July 31, 2013, to allow time for the appropriate documentation of the in-vessel downstream effects analysis.

If any questions arise or additional information is needed, please contact Bob Meixell of the Oconee Regulatory Affairs Group at (864) 873-3279.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on May 15, 2013

Very truly yours,



Scott L. Batson  
Vice President  
Oconee Nuclear Station

Attachment:

1. Oconee Nuclear Station - Generic Letter 2004-02 Supplemental Response, Commitments

U. S. Nuclear Regulatory Commission  
May 15, 2013  
Page 3

xc (with Attachment):

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

Mr. John P. Boska (electronic copy only)  
Oconee Project Manager, NRR/DORL  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Mail Stop O-8G9A  
Rockville, MD 20852-2746

Ed Crowe  
NRC Senior Resident Inspector  
Oconee Nuclear Station

Ms. Susan E. Jenkins  
Manager, Infectious and Radioactive Waste Management  
Bureau of Land and Waste Management  
Department of Health & Environmental Control  
2600 Bull Street, Columbia, SC 29201

Attachment 1

Oconee Nuclear Station  
Generic Letter 2004-02 Supplemental Response

Commitments

May 15, 2013

Attachment 1  
Generic Letter 2004-02 Supplemental Response  
May 15, 2013

Commit. #	Commitment	Due Date
1	Oconee will address the in-vessel downstream effects issue in subsequent correspondence.	July 31, 2013