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April 22, 2015

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

10 CFR 52, Appendix D.X.B

Subject: Duke Energy Carolinas, LLC
William States Lee III Nuclear Station – Docket Nos. 52-018 and 52-019
AP1000 Combined License Application for the
William States Lee III Nuclear Station Units 1 and 2
Departure Report Update
Ltr# WLG2015.04-01

Part 7 of the William States Lee III Nuclear Station (WLS) Units 1 and 2 COL Application contains the WLS Departure Report, which describes WLS-specific departures from the AP1000 Design Control Document (DCD), Revision 19. By letter WLG2014.10-01, dated October 22, 2014, Duke submitted an update to the WLS Units 1 and 2 COL Application, including a revision to Part 7, which contained an updated WLS Departure Report.

The purpose of this letter is to update the WLS Departure Report in accordance with Paragraphs X.B.1 and X.B.3.b of Appendix D to 10 CFR Part 52. There is one change to the departures contained in the WLS Departure Report identified during the most recent six-month reporting period.

If you have any questions or need any additional information, please contact Robert H. Kitchen, Nuclear Development Licensing Director, at (704) 382-4046.

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

Executed on April 22, 2015.

Sincerely,

Christopher M. Fallon
Vice President
Nuclear Development

D093
NRO

Enclosure: Six Month Departure Report

xc (w/ enclosure):

Frederick Brown, Deputy Regional Administrator, Region II
Brian Hughes, Senior Project Manager, DNRL

Enclosure
Duke Energy Letter Dated: April 22, 2015

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Enclosure to WLG2015.04-01

Six Month Departure Report

Departure Number: WLS DEP 3.2-1 REV. 1

Title: Addition of downspouts to the condensate return portion of the Passive Core Cooling System

Activity Description:

Addition of downspouts to the condensate return portion of the Passive Core Cooling System - Modifications to the Polar Crane Girder (PCG), Internal Stiffener, and Passive Core Cooling System (PXS) gutter design were made. The fabrication holes at the top surface of the PCG and in the stiffener are blocked, drainage holes in the bottom of the PCG boxes are blocked, and flow communication holes between PCG boxes are added. A downspout piping network was added to collect and transport condensation from the PCG and stiffener to PXS Collection Boxes. Eight new PXS downspout screens were added at the entrance of each of the downspouts at the top of the PCG and stiffener to prevent any larger debris from blocking the downspout piping.

This revision to WLS DEP 3.2-1 involved the addition of the downspout screens to the Technical Specification Surveillance Requirement 3.5.4.7. This addition will also require the licensee to verify by visual inspection that the downspout screens are not restricted by debris.

Summary of Evaluation:

The proposed change does not involve a significant reduction in the margin of safety. The proposed change does not reduce the redundancy or diversity of any safety-related SSCs. The proposed changes increase the amount of condensate available in the In-containment Refueling Water Storage Tank (IRWST) after the initiation of a design basis event.

The proposed change does not result in an adverse effect as a modification, addition to, or removal of a structure, system, or component (SSC), and has no adverse impact on plant operating procedures or a method of control, and does not result in an adverse effect on a change or a method of evaluation, or use of an alternate method of evaluation. This activity does not represent a test or experiment outside the reference bounds of the design basis, and does not alter the assumptions or results of the ex-vessel severe accident assessment. Therefore, this departure has no safety significance.

In conclusion, based on the considerations discussed above; 1) there is reasonable assurance the health and safety of the public will not be endangered by operation in the proposed manner, 2) such activities will be conducted in compliance with the Commission's regulations, and 3) the implementation of the change will not be inimical to the common defense and security or to the health and safety of the public.

This departure requires an exemption from the requirements of 10 CFR Part 52, Appendix D, Section III.B, which requires compliance with Tier 1 requirements of the AP1000 DCD.