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June 16, 2010

U.S. Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
Washington, D.C. 20555

Subject: Duke Energy Carolinas, LLC  
Oconee Nuclear Station (ONS) Units 1, 2, and 3  
Docket Numbers 50-269, 50-270 and 50-287  
McGuire Nuclear Station (MNS) Units 1 and 2  
Docket Numbers 50-369 and 50-370  
Catawba Nuclear Station (CNS) Units 1 and 2  
Docket Numbers 50-413 and 50-414

Letter of Intent to adopt Materials Reliability Program 227, Pressurized Water  
Reactor Internals Inspection and Evaluation Guidelines.

The purpose of this letter is to advise the Nuclear Regulatory Commission (NRC) of a forthcoming revision to an existing license renewal commitment to inspect the Reactor Vessel Internals (RVI) at each Duke Energy Carolinas, LLC (Duke Energy) nuclear station. The existing inspection commitments are contained in Section 18.3.20 of the ONS Updated Final Safety Analysis (UFSAR), Section 18.2.23 of the MNS UFSAR, and Section 18.2.22 of the CNS UFSAR. Each of these UFSAR sections contains an allowance that permits Duke Energy to modify or eliminate these inspections based on industry data or other evaluations if plant-specific justification is provided to demonstrate the basis for the modification or elimination.

The current RVI inspection commitments were developed based on industry knowledge available at the time licenses for ONS, MNS, and CNS were renewed. Since that time, industry led efforts have been in progress by the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) Reactor Internals Issues Task Group (RI-ITG) and, later, by the MRP Reactor Internals Focus Group (RI-FG). The EPRI MRP RI-FG has developed MRP-227, Pressurized Water Reactor Internals Inspection and Evaluation Guidelines (MRP-227- Rev. 0), which was submitted to the NRC for approval by EPRI letter dated January 12, 2009 (ADAMS Accession No. ML090160204). NRC approval of MRP-227 is anticipated by the end of 2010.

NUREG-1723, "NRC Safety Evaluation Report Related to the License Renewal of Oconee Nuclear Station Units 1, 2, and 3" contains a requirement that Duke Energy submit the

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recommended RVI inspection program for ONS Unit 1 at least two years prior to the first inspection (page 3-121). The first planned RVI inspection at ONS is on Unit 1 in the fall of 2012.

Duke Energy is revising its commitments for RVI inspections from those that currently exist in each station's UFSAR to the inspection guidelines provided by MRP-227 as approved by the NRC. Duke Energy will submit its revised RVI inspection plan for ONS Unit 1 later in 2010 and at least two years prior to the planned inspection. This RVI inspection plan will follow MRP-227, Rev. 0 and will be revised as necessary during its review by the NRC. Once this plan is approved, the ONS UFSAR will be updated as required by 10 CFR 50.71(e).

Duke Energy has been actively involved in the MRP RI-FG development of MRP-227 to ensure that the evaluations are applicable to all of the Duke Energy Nuclear Stations. As required by the UFSAR, Duke Energy will demonstrate that the inspection and evaluation guidance provided in MRP-227 is an acceptable inspection for the RVI at ONS.

If there are any questions concerning this letter, please contact Kent Alter at (864) 873-3255.

Sincerely,

*Richard J. Freudenberger*

*for*

Dave Baxter, Vice President,  
Oconee Nuclear Station

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