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CNS-14-025

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February 26, 2014

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

Duke Energy Carolinas, LLC (Duke Energy)
Catawba Nuclear Station, Units 1 and 2
Docket Numbers 50-413 and 50-414
Renewed License Numbers NPF-35 and NPF-52

10 CFR 50.4

Subject: Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

- References:
1. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012, ADAMS Accession Number ML12054A679
 2. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, Revision 0, dated August 29, 2012, ADAMS Accession Number ML12221A339
 3. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, Revision 1, dated August 2012, ADAMS Accession Number ML12240A307
 4. Duke Energy letter, *Duke Energy Carolinas, LLC, (Duke Energy) Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 29, 2012, ADAMS Accession Number ML12307A022
 5. Duke Energy letter, *Duke Energy Carolinas, LLC, (Duke Energy) Overall Integrated Plans in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013, ADAMS Accession Number ML13086A095
 6. Duke Energy letter, *Duke Energy Carolinas, LLC, (Duke Energy), First Six-Month Status Reports in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated August 26, 2013, ADAMS Accession Number ML13242A009
 7. NRC letter, *Catawba Nuclear Station, Units 1 and 2 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, dated October 28, 2013, ADAMS Accession Number ML13281A562

A001
NRR

On March 12, 2012, the NRC issued Order EA-12-051 (Reference 1) to Duke Energy. Reference 1 was immediately effective and directed Duke Energy to have a reliable indication of water level in spent fuel storage pools. Specific requirements were outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorsed industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the Duke Energy initial status report regarding spent fuel pool instrumentation. Reference 5 provided the Duke Energy overall integrated plan.

Reference 1 required submission of a status report at six-month intervals following submittal of the overall integrated plan. Reference 3 provided direction regarding the content of the status reports. Reference 6 provided the first six-month status report for Catawba. The purpose of this letter is to provide the second six-month status report pursuant to Section IV, Condition C.2, of Reference 1 that delineates progress made in implementing the requirements of Reference 1. Enclosure 1 provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any.

In Reference 7, the NRC provided an Interim Staff Evaluation (ISE) which included a Request for Additional Information (RAI) to Catawba. The NRC requested that a response to the RAI be provided in the next six-month status report, with all information provided by September 30, 2014. Catawba does not currently have sufficient information to provide a complete response to the RAI; therefore, Catawba will provide a response to the RAI in the next six-month status report.

This submittal contains no new regulatory commitments and no revisions to existing regulatory commitments.

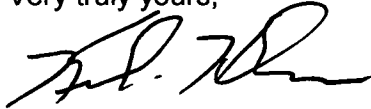
Should you have any questions regarding this submittal, please contact L.J. Rudy at (803) 701-3084.

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

Executed on February 26, 2014.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kelvin Henderson", written in a cursive style.

Kelvin Henderson

Vice President, Catawba Nuclear Station

LJR/s

Enclosure

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Enclosure

Second Six-Month Status Report (Order EA-12-051)
Catawba Nuclear Station, Units 1 and 2
Docket Numbers 50-413 and 50-414
Renewed License Numbers NPF-35 and NPF-52

Catawba Nuclear Station Second Six-Month Status Report for the Implementation of Order EA-12-051 Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation

1 Introduction

Catawba developed an Overall Integrated Plan (Reference 1 in Section 8), documenting the requirements to install reliable spent fuel pool level instrumentation in response to NRC Order EA-12-051. The first six-month update was provided to the NRC on August 26, 2013 (Reference 2 in Section 8). This enclosure provides an update of milestone accomplishments since the submittal of the first six-month update, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any, that occurred during the period from July 31, 2013 to January 28, 2014 (hereafter referred to as "the update period").

2 Milestone Accomplishments

No milestones were completed during the update period.

3 Milestone Schedule Status

There are no changes to the schedule as reported in Reference 1 in Section 8 (OIP).

4 Changes to Compliance Method

The following summarizes the changes to the strategies as documented in the Overall Integrated Plan (Reference 1 in Section 8) that were made during the update period. These changes do not impact Catawba Nuclear Station's compliance with NEI 12-02.

Change: Identification of Spent Fuel Pool Water Level 1 – Level that is adequate to support operation of the normal fuel pool cooling system – indicated level on either channel greater than the point at which pump suction is presumed to be lost (EL. 597' – 4").

Level 1 changed

From: (EL. 597' – 4")

To: (EL. 597' – 6")

Justification: Per NEI 12-02, Level 1 represents the HIGHER of the following two points: The level at which reliable suction loss occurs due to uncovering of the coolant inlet pipe, weir, or vacuum breaker (depending on the design) or the level at which the water height, assuming saturated conditions, above the centerline of the cooling pump suction provides the required net positive suction head specified by the pump manufacturer or engineering analysis. Elevation 597' - 6" is more conservative (higher) than both of these elevation points.

Documentation: July 23, 2013 letter from Catawba Nuclear Station to U.S. Nuclear Regulatory Commission, Request for Additional Information Overall Integrated Plan in Response to Order EA-12-051, "Reliable Spent Fuel Pool Instrumentation". The response to RAI-1 documents the basis for setting Level 1 at elevation 597' - 6".

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

Catawba expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

There are no open items documented in the Overall Integrated Plan. The Interim Staff Evaluation (ISE) received (Reference 7 in Section 8) included Requests for Additional Information (RAI).

7 Potential Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation identified at this time.

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. Duke Energy Letter, *Duke Energy Carolinas, LLC, (Duke Energy) Overall Integrated Plans in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated February 28, 2013

2. Duke Energy Letter, *Duke Energy Carolinas, LLC, (Duke Energy), First Six-Month Status Reports in Response to March 12, 2012, Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated August 26, 2013
3. NRC Order Number EA-12-051, *Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation*, dated March 12, 2012
4. NRC Interim Staff Guidance JLD-ISG-2012-03, *Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, dated August 29, 2012
5. NEI 12-02, *Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation"*, Revision 1, dated August 2012
6. Duke Energy Letter, *Duke Energy Carolinas, LLC, (Duke Energy) Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)*, dated October 29, 2012
7. NRC Letter, *Catawba Nuclear Station, Units 1 and 2 - Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation*, dated October 28, 2013