



DAVE BAXTER  
Vice President  
Oconee Nuclear Station

Duke Energy Corporation  
ON01VP/7800 Rochester Highway  
Seneca, SC 29672

864-885-4460  
864-885-4208 fax  
dabaxter@dukeenergy.com

May 27, 2008

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

Subject: Duke Energy Carolinas, LLC  
Oconee Nuclear Site Units 1, 2, and 3  
Docket Numbers 50-269, 50-270 and 50-287  
Request for Extension of Period of Enforcement Discretion during  
Implementation of NFPA 805

In a letter dated June 8, 2005, the Nuclear Regulatory Commission (NRC) acknowledged Duke Energy Carolinas, LLC (Duke) intention to adopt National Fire Protection Association (NFPA) Standard 805, "NFPA 805, Performance-Based Standard for Fire Protection for Light-Water Reactor Electric Generating Plants," 2001 edition, pursuant to 10 CFR 50.48(c), and granted Oconee (ONS) enforcement discretion during the expected 24 month transition period.

On April 18, 2006, the NRC published in Federal Register Notice 71 FR 19905 a revision in its enforcement policy extending the NFPA transition discretion period from 24 to 36 months. Duke requested an extension be applied to ONS in a letter dated April 30, 2007. The enforcement discretion extension was granted in a letter from the NRC dated June 1, 2007. Enforcement discretion is currently scheduled to end on May 31, 2008.

ONS is one of two pilot plants for NFPA 805 transition. As a result of pilot plant activities, ONS is working closely with the NRC on transition activities. In an April 14-16 Pilot meeting and a May 22, 2008 conference call, Duke communicated to the NRC that the NFPA 805 License Amendment Request (LAR) will be submitted in two parts. The first part will contain everything but the final Probabilistic Risk Analysis information, the change evaluation summaries, and the committed modifications. These items will be provided at a later date. Because of the unique nature of the LAR, additional time is being taken to ensure that Duke is meeting its internal quality standards. As a result,

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Duke requests that the enforcement discretion period be extended two additional weeks.

Duke will submit the NFPA 805 Transition Report and LAR by June 13, 2008.

If there are any questions, please contact Reene' Gambrell at (864) 885-3364.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Baxter". The signature is fluid and cursive, with a large loop at the end.

Dave Baxter, Vice President  
Oconee Nuclear Site

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cc w/enclosures :

Mr. Luis Reyes, Regional Administrator  
U. S. Nuclear Regulatory Commission – Region II  
Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
Atlanta, GA 30303

Mr. L. N. Olshan, Project Manager  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O-14 H25  
Washington, D. C. 20555

Mr. Paul Lain  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O-11 A11  
Washington, D. C. 20555

Mr. A. Hutto  
Senior Resident Inspector  
Oconee Nuclear Site

Susan E. Jenkins, Manager,  
Infectious and Radioactive Waste Management Section  
2600 Bull Street  
Columbia, SC 29201