

Lawrence B. Somers
Deputy General Counsel

Mailing Address: NCRH 20 / P.O. Box 1551 Raleigh, NC 27602

> o: 919.546.6722 f: 919.546.2694

bo.somers@duke-energy.com

October 9, 2015

VIA ELECTRONIC FILING

Gail L. Mount Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, North Carolina 27699-4300

RE: Duke Energy Carolinas, LLC's Report of Preconstruction Costs for

Lee Nuclear Station Project Development Activities

Docket No. E-7, Sub 819

Dear Ms. Mount:

Duke Energy Carolinas, LLC has completed an accounting review of the Lee Nuclear Station Project, resulting in corrections to the report filed on August 3, 2015. Please note that all changes impacted the 2007 spend; therefore amounts spent since the Commission's August 5, 2011 order are not impacted. I enclose those corrections, in clean and redlined formats, for filing in connection with the referenced matter.

Thank you for your attention to this matter. If you have any questions, please let me know.

Sincerely,

Lawrence B. Somers

Enclosure

cc: Parties of Record

NCUC Report
Preconstruction Costs for Lee Nuclear Station Project Development Activities
January 1, 2011- June 30, 2015 (corrected 09/30/15)

Task Description	01/01/2011- 12/31/2014	01/01/2015 - 06/30/2015	01/01/2011- 06/30/2015	Project Totals to Date
COLA Preparation	\$0	\$0	\$0	\$27,682,200
NRC Review & Hearing Fees	\$56,601,653	\$3,579,568	\$60,181,221	\$113,875,365
Land and Right-of-way Purchases	\$1,660,061	-\$33,400	\$1,626,662	\$44,930,973
Pre-construction and Site Preparation	\$24,218,901	\$58,826	\$24,277,726	\$45,903,550
Supply Chain, Construction Planning, and Detailed Engineering	\$32,325,170	\$702,255	\$33,027,425	\$55,257,272
Operational Planning	\$4,024,343	\$428,363	\$4,452,705	\$6,004,310
AFUDC	\$99,347,597	\$17,007,934	\$116,355,531	\$155,938,985
Total	\$218,177,724	\$21,743,547	\$239,921,271	\$449,592,656

The activities included in each category are as follows:

COLA Preparation – includes Duke labor, expenses and contract support for preparation of the Combined Construction and Operating License (COL) Application tendered to the Nuclear Regulatory Commission (NRC) on 12/13/07. The NRC determined the application was suitable for review and docketed the application on 02/25/08.

NRC Review and Hearing Fees — includes the cost of the NRC review fees, Duke labor and expenses, contract labor and legal support required to support the NRC review of the Lee Nuclear Station COL application, and preparation for the Advisory Committee on Reactor Safeguards Subcommittee Hearing. Category also includes interactions with South Carolina Department of Health and Environmental Control (SCDHEC) and the US Army Corps of (USACE), as required to move the environmental permit applications forward. The Lee project received the National Pollutant Discharge Elimination System (NPDES) Operations permit on July 17, 2013. The Final Environmental Impact Statement was issued by the NRC on December 23, 2013, and the 401Water Quality Certification was issued on January 2, 2014. The Final Environmental Impact Statement prepared by the U.S. Forest Service to support mitigation activities in Sumter National Forest was issued on December 5, 2014.

Land and Right-of-Way Purchases — includes the purchase of land required for the Lee site and rail right-of-ways. Category also includes cost of purchasing additional land for a supplemental

cooling pond in event of severe drought as well as costs for surveying the selected transmission right-of-way.

Pre-construction and Site Preparation — includes site activities to both maintain the site and prepare the site for construction. Site preparation activities included: dewatering and cleanup of the excavated area, site remediation activities required to identify and properly dispose of hazardous wastes, and costs associated with the demolition and removal of unusable structures. Necessary maintenance of existing rail bed and required Make-up Pond B spillway repair were completed. Engineering of offsite infrastructure for potable water, sewer, and rail spur; and, geotechnical evaluations (needed for engineering) have been completed. Engineering for bringing communications to the site is also included in this category. Engineering of necessary traffic improvements was brought to 85% completion by December 2013. Ongoing and continuing activities include: site security, utilities and miscellaneous site maintenance.

Supply Chain, Construction Planning and Engineering – includes activities associated with working with the supplier to negotiate an Engineering, Procurement and Construction (EPC) agreement. Negotiations in 2008 did not result in an executed contract. Conceptual site specific engineering and construction planning activities necessary to develop a complete project definition are included in this category. Continuing construction planning activities serve to further develop construction plans and keep the construction plans in line with latest engineering. Detailed site specific engineering began in January, 2011, and was brought to 70% completion in December 2013. Commercial building design activities started in June 2012. Design of the first six commercial buildings was completed in December 2013.

Operational Planning — includes activities associated with operator and plant staff training, including costs associated with the Knowledge and Abilities Catalog, required for operator license examinations for AP1000 plants, and the standardization of the nomenclature in the Westinghouse Master Equipment List (MEL). Continuing activities include: supporting operations program development, such as Quality Assurance (QA) Program, and the review of approximately 500 procedures. The training materials, operational programs, and operating procedures are all being developed in concert with other AP1000 utilities within the APOG framework. The *Operational Planning* category also includes generation of administrative procedures that must be in place upon receipt of COL from NRC.

Task Description	01/01/2011- 12/31/2014	01/01/2015 - 06/30/2015	01/01/2011- 06/30/2015	Project Totals to Date
COLA Preparation	\$0	\$0	\$0	\$ 27,426,317 \$27,682,200
NRC Review & Hearing Fees	\$56,601,653	\$3,579,568	\$60,181,221	\$113,875,365
Land and Right-of-way Purchases	\$1,660,061	-\$33,400	\$1,626,662	\$44,692,534 \$44,930,973
Pre-construction and Site Preparation	\$24,218,901	\$58,826	\$24,277,726	\$45,782,155 \$45,903,550
Supply Chain, Construction Planning, and Detailed Engineering	\$32,325,170	\$702,255	\$33,027,425	\$55,257,272
Operational Planning	\$4,024,343	\$428,363	\$4,452,705	\$6,004,310
AFUDC	\$99,347,597	\$17,007,934	\$116,355,531	\$155,938,985
Total	\$218,177,724	\$21,743,547	\$239,921,271	\$44 8,976,939 \$449,592,656

The activities included in each category are as follows:

September 30, 2015

COLA Preparation – includes Duke labor, expenses and contract support for preparation of the Combined Construction and Operating License (COL) Application tendered to the Nuclear Regulatory Commission (NRC) on 12/13/07. The NRC determined the application was suitable for review and docketed the application on 02/25/08.

NRC Review and Hearing Fees — includes the cost of the NRC review fees, Duke labor and expenses, contract labor and legal support required to support the NRC review of the Lee Nuclear Station COL application, and preparation for the Advisory Committee on Reactor Safeguards Subcommittee Hearing. Category also includes interactions with South Carolina Department of Health and Environmental Control (SCDHEC) and the US Army Corps of (USACE), as required to move the environmental permit applications forward. The Lee project received the National Pollutant Discharge Elimination System (NPDES) Operations permit on July 17, 2013. The Final Environmental Impact Statement was issued by the NRC on December 23, 2013, and the 401Water Quality Certification was issued on January 2, 2014. The Final Environmental Impact Statement prepared by the U.S. Forest Service to support mitigation activities in Sumter National Forest was issued on December 5, 2014.

Land and Right-of-Way Purchases — includes the purchase of land required for the Lee site and rail right-of-ways. Category also includes cost of purchasing additional land for a supplemental

cooling pond in event of severe drought as well as costs for surveying the selected transmission right-of-way.

Pre-construction and Site Preparation — includes site activities to both maintain the site and prepare the site for construction. Site preparation activities included: dewatering and cleanup of the excavated area, site remediation activities required to identify and properly dispose of hazardous wastes, and costs associated with the demolition and removal of unusable structures. Necessary maintenance of existing rail bed and required Make-up Pond B spillway repair were completed. Engineering of offsite infrastructure for potable water, sewer, and rail spur; and, geotechnical evaluations (needed for engineering) have been completed. Engineering for bringing communications to the site is also included in this category. Engineering of necessary traffic improvements was brought to 85% completion by December 2013. Ongoing and continuing activities include: site security, utilities and miscellaneous site maintenance.

Supply Chain, Construction Planning and Engineering - includes activities associated with working with the supplier to negotiate an Engineering, Procurement and Construction (EPC) agreement. Negotiations in 2008 did not result in an executed contract. Conceptual site specific engineering and construction planning activities necessary to develop a complete project definition are included in this category. Continuing construction planning activities serve to further develop construction plans and keep the construction plans in line with latest engineering. Detailed site specific engineering began in January, 2011, and was brought to 70% completion in December 2013. Commercial building design activities started in June 2012. Design of the first six commercial buildings was completed in December 2013.

Operational Planning - includes activities associated with operator and plant staff training, including costs associated with the Knowledge and Abilities Catalog, required for operator license examinations for AP1000 plants, and the standardization of the nomenclature in the Westinghouse Master Equipment List (MEL). Continuing activities include: supporting operations program development, such as Quality Assurance (QA) Program, and the review of approximately 500 procedures. The training materials, operational programs, and operating procedures are all being developed in concert with other AP1000 utilities within the APOG framework. The *Operational Planning* category also includes generation of administrative procedures that must be in place upon receipt of COL from NRC.

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC's Revised Report of Preconstruction Costs for Lee Nuclear Station Project Development Activities, in Docket No. E-7, Sub 819, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to the following parties of record:

Antoinette R. Wike NCUC – Public Staff 4326 Mail Service Center Raleigh, NC 27699-4326 antoinette.wike@psncuc.nc.gov

Robert F. Page Crisp, Page & Currin, LLP 4010 Barrett Drive, Suite 205 Raleigh, NC 27609-6622 rpage@cpclaw.com

Sharon Miller Carolina Utility Customer Assoc., Inc. 1708 Trawick Road, Suite 210 Raleigh, NC 27604 smiller@cucainc.org

Kevin C. Greene
Brandon F. Marzo
Troutman Sanders, LLP
Bank of America Plaza, Suite 5200
600 Peachtree Street
Atlanta, GA 30308-2216
kevin.greene@troutmansanders.com
brandon.marzo@troutmansanders.com

This the 9th day of October, 2015.

Margaret A. Force Department of Justice Post Office Box 629 Raleigh, NC 27602-0629 pforce@ncdoi.gov

John D. Runkle 2121 Damascus Church Road Chapel Hill, NC 27516 <u>jrunkle@pricecreek.com</u>

Wells Eddleman 811 Yancy Street Durham, NC 27701-3151

Ralph McDonald Bailey & Dixon Post Office Box 1351 Raleigh, NC 27602-1351 rmcdonald@bdixon.com

Lawrence B. Somers
Deputy General Counsel
Duke Energy Corporation
P.O. Box 1551/NCRH 20
Raleigh, NC 27602-1551

Tel: 919.546.6722

bo.somers@duke-energy.com