

RAS 2575

# HARMON, CURRAN, SPIELBERG & EISENBERG, LLP

1726 M Street, NW, Suite 600 Washington, DC 20036



DOCKETED  
USNRC

(202) 328-3500 (202) 328-6918 fax

January 2, 2001

01 JAN -3 P3:10

Emile Julian, Assistant for Rulemakings and Adjudications  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

SUBJECT: Harris License Amendment Proceeding, Docket No. 50-400LA

Dear Mr. Julian:

I am enclosing the original signed signature page for the Declaration of 22 December 2000 by Dr. Gordon Thompson Regarding the Potential for a Severe Accident at Spent Fuel Pools C & D at the Harris Nuclear Power Plant (December 22, 2000). Dr. Thompson's Declaration was filed on December 22 in support of Orange County's Petition for Review and Request for Immediate Suspension and Stay of the NRC Staff's No Significant Hazards Determination and Issuance of License Amendment for Harris Spent Fuel Pool Expansion. I regret that, due to time constraints, I was unable to file the original signature page on December 22.

Sincerely,

Diane Curran

cc w/ encl.: service list

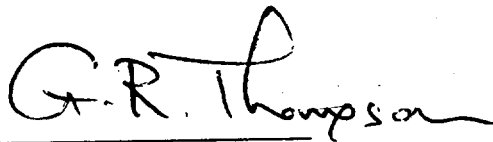
Template = SECY-043

SECY-02

(18) The principal area of disagreement among the parties is in their estimation of the conditional probability that a degraded-core accident with containment failure or bypass would preclude actions that are needed to provide cooling or makeup to the Harris pools. For a selected set of degraded-core accident sequences, Orange County found that this conditional probability would be one. As a result, Orange County estimated that the probability of a pool fire at Harris is comparable to the probability of a degraded-core accident with containment failure or bypass. (See paragraph (9), above.) CP&L and the NRC staff provided lower estimates for the probability of a pool fire. During the oral arguments of 7 December 2000, it became obvious that the differences among the parties' findings cannot be understood without an evidentiary hearing.

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

Executed on 22 December 2000.

  
Gordon Thompson