CP&L
A Progress Energy Company

James Scarola
Vice President
Harris Nuclear Plant

NOV 2 1 2002

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

SERIAL: HNP-02-153
10CFR50.90

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR ADDITIONAL INFORMATION (RAI) ON AMENDMENT APPLICATION REGARDING ADDITION OF METHODOLOGY REFERENCES TO THE CORE OPERATING LIMITS REPORT (TAC NO. MB6226)

Dear Sir or Madam:

This letter provides information as requested by the NRC in the Request for Additional Information letter dated October 23, 2002, to supplement or clarify the information provided in the amendment request for the addition of methodology references for the Harris Plant Core Operating Limits Report. In a letter dated August 28, 2002 and in accordance with the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L requested a revision to the Technical Specifications (TS) for the Harris Nuclear Plant (HNP). The proposed amendment would revise the TS to incorporate analytical methodology references in TS 6.9.1.6.2, which are used to determine core operating limits. These analytical methodologies are documented in topical reports, which have been accepted by the Nuclear Regulatory Commission for referencing in licensing applications.

Attachment 1 contains the responses to the NRC questions regarding this submittal.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of North Carolina with a copy of the proposed license amendment.

Please refer any questions regarding this submittal to Mr. J. R. Caves at (919) 362-3137.

Sincerely,

James Scarola

A001

PO Box 165
New Hill, NC 27562

T> 919 362 2502
F> 919 362 2095

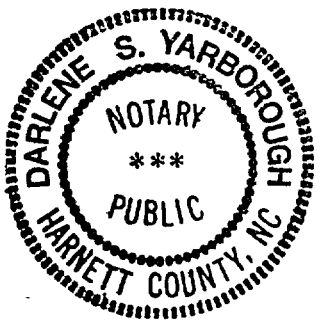
RTG

Attachment:

1. Supplemental Information in support of the License Amendment request.

James Scarola, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief, and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.

Darlene S. Yarborough



Notary (Seal)
My commission expires:
2-21-2005

c:
Mr. J. B. Brady, NRC Sr. Resident Inspector
Ms. Beverly Hall, Section Chief, Radiation Protection Section, N.C. DENR
Mr. R. Subbaratnam, NRC Project Manager
Mr. L. A. Reyes, NRC Regional Administrator

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR ADDITIONAL INFORMATION (RAI)
ON AMENDMENT APPLICATION REGARDING ADDITION OF METHODOLOGY
REFERENCES TO THE CORE OPERATING LIMITS REPORT (TAC NO. MB6226)

QUESTIONS AND RESPONSES

1. The NRC's safety evaluation of Topical Report EMF-2328(P)(A), Revision 0, "PWR Small Break LOCA Evaluation Model, S-RELAP5 Based" states a condition on the use of ANF-RELAP code that still applies to the use of S-RELAP5. The statement is:

> "That while it has been shown in Reference 53 [Loomis, G.G., "Summary of the Semiscale Program (1965-1986)," NUREG/CR-4945, July 1987] that the thermal-hydraulic phenomena observed for breaks up to 10 percent of the cold leg flow area are the same, if the code is used for break sizes larger than 10 percent of the cold leg flow area additional assessments must be performed to ensure that the code is predicting the important phenomena which may occur."

Your submittal did not state the break size range for which you intend to use the code. Please provide information that says what break size range you intend to use the code for, and if you intend to use the code for breaks larger than 10 percent of the cold leg flow area, also provide the required additional assessments.

Response: Carolina Power & Light (CP&L) intends to use the EMF-2328(P)(A) methodology strictly within the limitations imposed on that methodology by the SER, including the limitation to uses for break sizes only up to 10% of the cold leg flow area. Therefore no additional assessments to justify the use of that methodology for larger break sizes are required.

2. The NRC's safety evaluation of Topical Report EMF-2310(P)(A), Revision 0, "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors" states in Section 5.0 "Evaluation of S-RELAP5:"

"The staff notes, however, that a generic topical report describing a code such as S-RELAP5 cannot provide full justification for each specific individual plant application. The individual applicant must still provide justification for the specific application of the code which is expected to include as a minimum, the nodalization, defense of the chosen parameters, any needed sensitivity studies, justification of the conservative nature of the input parameters, and calculated results."

Your submittal did not include any justification of your specific application of the code. Please provide the necessary information.

Response: CP&L is aware of the discussions between the NRC and Framatome-ANP about the interpretation of the SER restriction that is the subject of this RAI. CP&L is awaiting the outcome of these discussions and will abide by the NRC's final direction on this issue.

CP&L concurs with Framatome-ANP that the purpose of a topical report is to minimize the time and resources that both the industry and the NRC expend on repetitive reviews of the same topic by providing for a single review and acceptance of the specified methodology and criteria. It is our desire that the discussions between FRA-ANP and the NRC result in the NRC approval of our Technical Specification change request without the need for additional plant specific analysis submittals.