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U.S. Nuclear Regulatory Commission  
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**SUBJECT:** Progress Energy COL Project - NRC Project No. 738  
Response to RIS 2006-006, New Reactor Standardization Needed  
to Support the Design-Centered Licensing Review Approach

**REFERENCE:** NRC Regulatory Issue Summary 2006-006, *New Reactor Standardization Needed to Support the Design-Centered Licensing Review Approach*; dated May 31, 2006

In the reference Regulatory Issue Summary (RIS), the Nuclear Regulatory Commission (NRC) indicated that it is developing its resource estimates and project plan for a Design-Centered Review Approach (DCRA) strategy. To support this effort, the NRC identified several specific scheduler and standardization information items that would be useful in their preparation.

Progress Energy supports and endorses the design-centered review approach proposed by the NRC. Responses to the specific bulleted items from the RIS are provided in Enclosure 1 for the Progress Energy Harris and Florida Combined Construction and Operating License (COL) Projects. This information has been coordinated with the AP 1000 Reference Plant information.

If you have any questions, please contact me at (919) 546-6992 or at [robert.kitchen@pgnmail.com](mailto:robert.kitchen@pgnmail.com).

Sincerely,

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Enclosure: Progress Energy Response to RIS 2006-006

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**Enclosure 1**  
**Progress Energy Response to NRC RIS 2006-006**  
**New Reactor Standardization Needed to Support the**  
**Design-Centered Licensing Review Approach**

Each RIS 2006-006 information request is addressed below. The information provided in this response to the request has been coordinated with the AP1000 Reference Plant response.

Information Request #1: Whether applicants for the four designs discussed in this RIS will be organized into design-centered working groups (DCWGs); if so, the schedule for such organization and, if a single point of contact is designated for the DCWG, the contact's identity.

Response: Progress Energy intends to submit two combined license application (COLA) for four new reactors of the AP1000 design. One COLA will be for reactors sited at the Harris nuclear site near Raleigh, NC. The second COLA will be for units which will be located in Florida. Site selection for the units in Florida is scheduled to be complete this summer. The companies currently identified as also having intent to submit a combined license application for the AP1000 design have organized into a DCWG, as discussed with the NRC Staff previously. The AP1000 DCWG will also offer membership to any future declarants. Peter Hastings of Duke Energy has been identified as the AP 1000 Reference Plant Licensing Lead for NuStart and NRC point of contact for the AP 1000 DCWG.

Information Request #2: If a design-centered program is followed for a particular design, which applicant referencing the design will be designated as the R-COL applicant? In addition, when will (month and year) each of the COL applications be submitted for review?

Response: For the new reactors of the AP1000 design, the reference combined license (R-COL) applicant will be submitted for the Bellefonte Project, as discussed with the NRC staff previously (each currently declared AP1000 applicant is a member of NuStart). The Progress Energy Harris Plant COL application is scheduled for submittal in October 2007. The Progress Energy Florida Plant COL application is scheduled for submittal in July 2008. The Bellefonte Project COL application is expected to be the earliest COL application for the AP1000 design. The date of the Bellefonte Project application is, however, dependent on several key assumptions. This is further addressed in the Bellefonte Project R-COL response to this RIS.

Information Request #3: Whether applicants implementing the DCRA intend to provide RAI responses within the typical 30-day period.

Response: Yes, for plant-specific requests for additional information (RAIs) Progress Energy expects to provide most RAI responses within a typical 30-day period. Longer periods may however, be necessary for RAIs requiring substantial new evaluation or analysis, or consisting of a substantial number of questions. When it is determined that the typical 30-day response period cannot be met, Progress Energy will contact the NRC Project Manager and reach agreement on a schedule for providing the response to the NRC.

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For RAIs concerning standardized content, Progress Energy expects to provide conforming or clarifying responses, as applicable, within 30 days or less of the R-COL application RAI responses.

Information Request #4: To what degree standardization will be achieved, appropriately documented, and replicated in COL applications. Specifically, what portions of the R-COL application (chapter by chapter, section by section, subsection by subsection) will be standardized (i.e., replicated verbatim) in S-COL applications and what portions of the application are likely to be site-specific.

Response: Progress Energy supports and endorses the design-centered review approach proposed by the NRC. Standardization is expected to be substantial for the AP1000 COL applications as addressed in the Bellefonte Project R-COL response to this RIS, which included a current AP 1000 standardization matrix (on a subsection by subsection basis).

Progress Energy will incorporate standardized material to the full extent practical.

Information Request #5: Whether, for each design-centered program, the vendor and applicants intend to submit pre-application topical reports for staff review. If so, how many? For each such report anticipated, please summarize the report scope and content and the proposed submittal schedule.

Response: Submittal of pre-application topical reports for the AP1000 DCWG is addressed in the Bellefonte Project R-COL response to this RIS.

Progress Energy has not identified, at this time, any site-specific pre-application topical reports for staff review. However, based on the interpretation of existing regulations and the projected early completion of site specific application sections, future discussions with the NRC staff may be pursued to support early submittal of these site specific portions of our application.

Question #6: Whether any applicants intend to apply for an ESP prior to submitting their COL applications. If so, when (month and year) would the proposed ESP be submitted to the NRC for review?

Progress Energy does not intend to apply for an early site permit (ESP) prior to submitting the COL applications.