UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 9, 2008

Chris L. Burton, Vice President
Shearon HNP Nuclear Power Plant
Carolina Power & Light Company
Post Office Box 165, Mail Zone 1
New Hill, North Carolina 27562-0165

SUBJECT: SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1 – REQUEST FOR ADDITIONAL INFORMATION REGARDING RELIEF REQUEST I3R-02 FOR THE THIRD 10-YEAR INSERVICE INSPECTION INTERVAL (TAC NO. MD8742)

Dear Mr. Burton:

By letter dated April 29, 2008, as supplemented by letter dated June 19, 2008, Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc., submitted a relief request for the Shearon Harris Nuclear Power Plant, Unit 1 (HNP).

The relief request proposes a risk-informed selection and examination program as an alternative to a portion of the third 10-year inservice inspection interval for HNP, on the basis that the alternative provides an acceptable level of quality and safety.

The U.S. Nuclear Regulatory Commission staff has determined that it needs additional information in order to complete its review. Please respond to the enclosed questions by January 9, 2009, in order to facilitate a timely completion of the staff review. Please contact me at 301-415-3178 if you have any questions on this issue, would like to participate in a conference call, or if you require additional time to submit your responses.

Sincerely,

Marlayna Vaaler, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-400

Enclosure: As stated

cc w/enclosure: Distribution via ListServ

UNITED STATES
NUCLEAR REGULATORY COMMISSION
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REQUEST FOR ADDITIONAL INFORMATION

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

RELIEF REQUEST I3R-02 FOR THE THIRD TEN YEAR INSERVICE INSPECTION INTERVAL

DOCKET NO. 50-400

The NRC staff has determined that it needs responses to the following questions in order to continue its review of the subject document:

1. In section 4.0 of relief request I3R-02, "Reason for Request," the last full paragraph on page 3 of 6 of the April 29, 2008, submittal states:

> The Risk Impact Assessment completed as part of the original baseline RISI [Risk-Informed Inservice Inspection] Program was an implementation/transition check on the initial impact of converting from a traditional ASME [American Society of Mechanical Engineers] Section XI program to the new RISI methodology. For the Third Interval ISI [Inservice Inspection] update, there is no transition occurring between two different methodologies, but rather, the currently approved RISI methodology and evaluation will be maintained for the new interval. As such, the original risk impact assessment process is not impacted by the new interval and does not require update.

The staff believes that the original risk impact assessment is in fact impacted because the selection of welds and timing of inspections is different during the fourth ISI interval. In addition, the living process approved for the Risk-Informed Inservice Inspection (RI-ISI) program requires this revised risk assessment. Furthermore, the submittal is requesting relief to implement a RI-ISI program instead of a traditional ASME program for the third ISI interval, so there is a change from the methodology that would normally be used (i.e., without a relief request).

NRC Regulatory Guide 1.178, "An Approach for Plant-Specific Risk-Informed Decisionmaking for Inservice Inspection of Piping," and the Electric Power Research Institute Topical Report, EPRI TR-112657, Revision B-A, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," require an evaluation of the change in risk arising from the proposed change to the ISI program.

Please provide an estimate of the potential change in risk between the RI-ISI program proposed for implementation during the third ISI interval and the ASME Section XI requirements that existed prior to the implementation of the first RI-ISI program.

Enclosure

2. In section 4.0 of relief request I3R-02, "Reason for Request," the paragraph that starts as the last paragraph on page 3 of 6 of the April 29, 2008, submittal states:

> As an added measure of assurance, any new systems, portions of systems, or components being included in the RISI Program for the Third Inspection Interval will be added to the Risk Impact Assessment performed during the previous interval. These components will be addressed within the evaluation at the start of the new interval to assure that the new Third Inspection Interval RISI element selection provides an acceptable overall change-in-risk when compared to the old ASME Section XI population of exams which existed prior to the implementation of the first RISI Program.

The evaluations described above should have already been performed and the results of the evaluations used to support the development of the proposed RI-ISI program. Please provide a brief description of these evaluations and an overview of the results.

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/RA/

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