



Serial: NPD-NRC-2008-081
December 16, 2008

10CFR52.79

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

**SHEARON HARRIS NUCLEAR POWER PLANT, UNITS 2 AND 3
DOCKET NOS. 52-022 AND 52-023
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 049 RELATED TO
MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION**

Reference: Letter from Brian C. Anderson (NRC) to James Scarola (PEC), dated November 18, 2008, "Request for Additional Information Letter No. 049 Related to SRP Section 13.1.1 for the Shearon Harris Units 2 and 3 Combined License Application"

Ladies and Gentlemen:

Progress Energy Carolinas, Inc. (PEC) hereby submits our response to the Nuclear Regulatory Commission's (NRC) request for additional information provided in the referenced letter.

A response to the NRC request is addressed in the enclosure. The enclosure also identifies changes that will be made in a future revision of the Shearon Harris Nuclear Power Plant Units 2 and 3 application.

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (919) 546-6107.

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

Executed on December 16, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read 'Garry D. Miller'.

Garry D. Miller
General Manager
Nuclear Plant Development

Enclosure

cc : U.S. NRC Director, Office of New Reactors/NRLPO
U.S. NRC Office of Nuclear Reactor Regulation/NRLPO
U.S. NRC Region II, Regional Administrator
U.S. NRC Resident Inspector, SHNPP Unit 1
Mr. Manny Comar, U.S. NRC Project Manager

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**Shearon Harris Nuclear Power Plant Units 2 and 3
Response to NRC Request for Additional Information Letter No. 049 Related to
SRP Section 13.1.1 for the Combined License Application, dated November 18, 2008**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
13.01.01-1	H-0281	Response enclosed – see following pages
13.01.01-2	H-0282	Response enclosed – see following pages
13.01.01-3	H-0283	Response enclosed – see following pages
13.01.01-4	H-0284	Response enclosed – see following pages

NRC Letter No.: HAR-RAI-LTR-049

NRC Letter Date: November 18, 2008

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.01.01-1

Text of NRC RAI:

SRP 13.1.1 I.1.B.iii requests, as part of the management organization for the initial test program, a description of the proposed plans for the development of plant maintenance programs.

Where is this information in the application?

PGN RAI ID #: H-0281

PGN Response to NRC RAI:

Plant maintenance procedures are developed by maintenance, engineering, and work control department personnel to provide programs that ensure proper operability and reliability of plant equipment. These programs are developed and made effective during the pre-operation/startup phase with approved administrative procedures such that as equipment is placed in service it will be monitored and maintained under approved maintenance programs. FSAR Chapter 13, Appendix 13AA will be clarified to reflect maintenance program development in a future FSAR revision.

Associated HAR COL Application Revisions:

The following change will be made in a future revision to the HAR FSAR:

Add the following paragraph after the last sentence of FSAR Subsection 13AA.1.1.1.1.8:

To ensure equipment operability and reliability, plant maintenance programs such as preventive and corrective maintenance are developed and made effective during the pre-operation /startup phase with approved administrative procedures under the direction of the managers in charge of maintenance, engineering and work control.

Attachments/Enclosures:

None.

NRC Letter No.: HAR-RAI-LTR-049

NRC Letter Date: November 18, 2008

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.01.01-2

Text of NRC RAI:

SRP 13.1.1 I.1.B.viii requests, as part of the management organization for the initial test program, a description of how applicant's management interfaces with the NSSS and AE organizations.

Where is this information in the application?

PGN RAI ID #: H-0282

PGN Response to NRC RAI:

FSAR Appendix 13AA provides discussion and a figure which address how management interfaces with the NSSS and AE organizations, which together are referred to as engineering, procurement, and construction (EPC) contractor.

Figure 13AA-201 shows the construction management organization. The construction management organization includes Progress Energy personnel and EPC personnel. As indicated in Figure 13AA-201, the project director of the EPC contractor reports to the Progress Energy site executive. In addition to Figure 13AA-201, the following FSAR subsections provide interface information:

- Design - FSAR Subsection 13AA.1.1.1.1.3 addresses interface requirements associated with design between the reactor technology vendor and plant staff.
- Construction - FSAR Subsection 13AA.1.1.1.1.8 addresses accountability of the EPC contractor to the site executive in addition to monitoring of contractor performance.
- Pre-operation – FSAR Subsection 13AA.1.1.1.2.2 addresses the preoperational and startup testing organization. Pre-operation and startup testing is performed by the plant test and operation (PT&O) organization and is managed by the functional manager in charge of startup testing as discussed in FSAR Subsection 14.2.2.1.4. Interface responsibilities described include:
 - participation in the joint test working group (JTWG) which is a group made up of Progress Energy and EPC personnel to review and approve testing,
 - coordinating turnover of systems from construction to PT&O, and
 - coordinating vendor participation in testing.

This information satisfies the SRP requirement to describe how station management interfaces with the NSSS and AE organizations for design, construction, and pre-operation.

Associated HAR COLA Application Revisions:

No COLA changes have been identified associated with this response.

Attachments/Enclosures:

None.

NRC Letter No.: HAR-RAI-LTR-049

NRC Letter Date: November 18, 2008

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.01.01-3

Text of NRC RAI:

SRP 13.1.1 I.1.B.xi requests, as part of the management organization for the initial test program, for the identified positions or classes of positions that have functional responsibilities other than for the COL application, the expected proportion of time assigned to the other activities.

Where is this information in the application?

PGN RAI ID #: H-0283

PGN Response to NRC RAI:

FSAR Figure 13AA-201 illustrates the construction management organization and includes positions identified that have functional responsibilities for design, construction, or preoperational testing of Harris Units 2 and 3 (HAR). These managers, functional managers, and personnel that report to them will perform their duties specific to HAR. No collateral responsibilities outside of the HAR project have been identified for these personnel.

Since these personnel have no other functional responsibilities, no additional FSAR discussion is required to satisfy this SRP requirement.

Associated HAR COLA Application Revisions:

No COLA changes have been identified associated with this response.

Attachments/Enclosures:

None.

NRC Letter No.: HAR-RAI-LTR-049

NRC Letter Date: November 18, 2008

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.01.01-4

Text of NRC RAI:

SRP 13.1.1 I.2.B requests, the SAR should provide, with verification through the Construction Inspection Program, the relationship of the nuclear-oriented part of the organization to the rest of the corporate organization.

Where is this information in the application?

PGN RAI ID #: H-0284

PGN Response to NRC RAI:

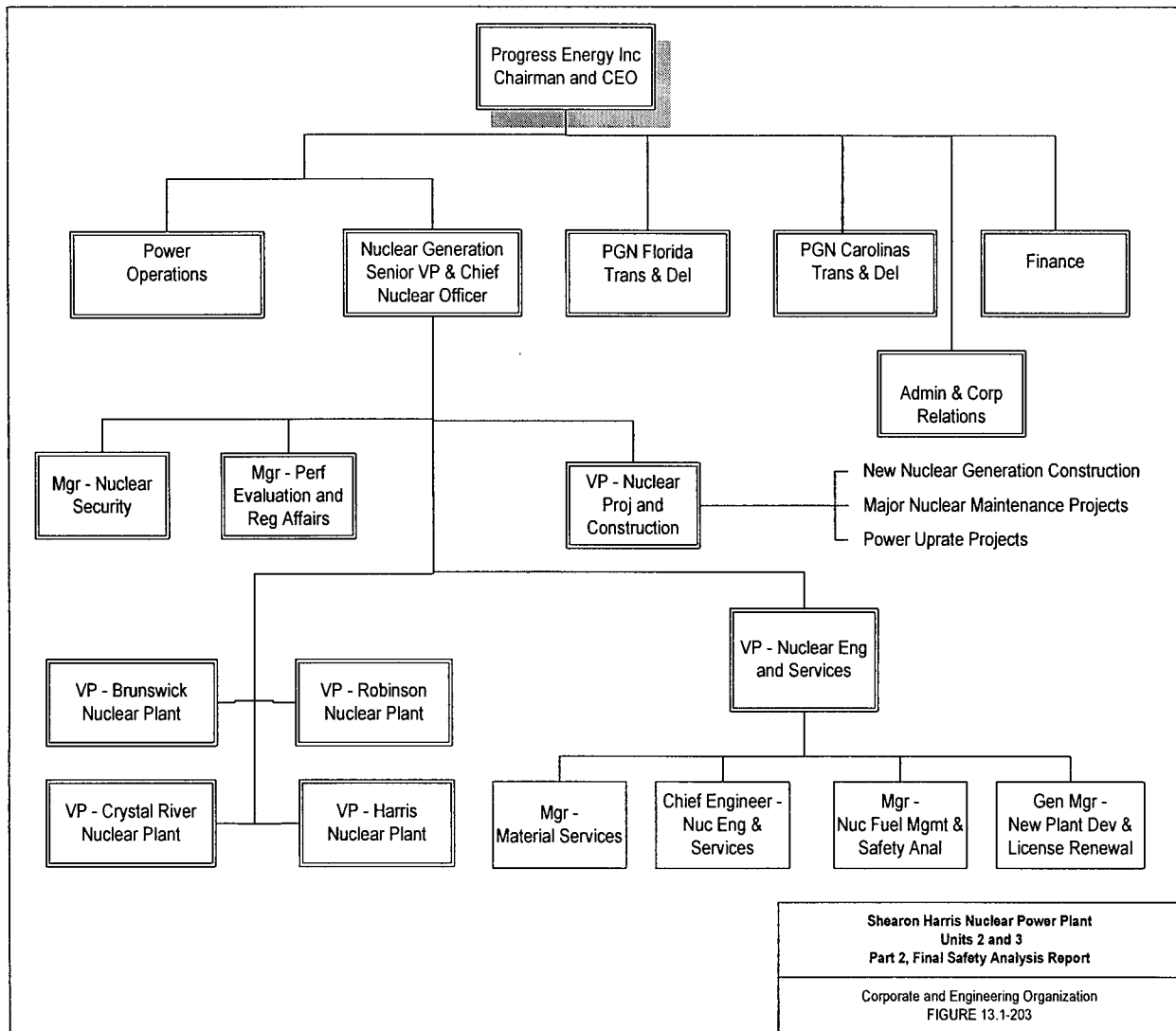
FSAR Section 13.1.1.3.1.1 states that the CEO is responsible for directing Progress Energy's core operational business including Progress Energy Florida, Progress Energy Carolinas, Nuclear Generation and Power Operations Groups. FSAR Section 13.1.1.3.1.2 states that the CNO for the Nuclear Generation Group is responsible for overall plant nuclear safety and takes the measures needed to provide acceptable performance of the staff in constructing, operating, maintaining, and providing technical support to the plant.

To clarify how the nuclear-oriented part of the corporation (NGG) relates to the other major corporate departments of Power Operations, Transmission & Delivery, Administration & Corporate Relations, and Finance, organizational links will be added to Figure 13.1-203.

Associated HAR COLA Application Revisions:

The following change will be made in a future revision to the HAR FSAR:

Revise Figure 13.1-203 to include functional organizational links showing how the Nuclear Generation Group (NGG) relates to the other major corporate departments as shown below:



Attachments/Enclosures:

None.