



Serial: NPD-NRC-2009-138
July 13, 2009

10CFR52.79

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

**LEVY NUCLEAR POWER PLANT, UNITS 1 AND 2
DOCKET NOS. 52-029 AND 52-030
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 042 RELATED TO
ONSITE AC POWER SYSTEMS**

Reference: Letter from Tanya Simms (NRC) to Garry Miller (PEF), dated May 19, 2009,
"Request for Additional Information Letter No. 042 Related to SRP Section
08.03.01 for the Levy County Nuclear Plant Units 1 and 2 Combined License
Application"

Ladies and Gentlemen:

Progress Energy Florida, Inc. (PEF) 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 a change that will be made in a future revision of the Levy Nuclear Power Plant Units 1 and 2 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 July 13, 2009.

Sincerely,

A handwritten signature in black ink that reads "Garry D. Miller".

Garry D. Miller
General Manager
Nuclear Plant Development

Enclosure

cc : U.S. NRC Region II, Regional Administrator
Mr. Brian C. Anderson, U.S. NRC Project Manager

**Levy Nuclear Power Plant Units 1 and 2
Response to NRC Request for Additional Information Letter No. 042 Related to
SRP Section 08.03.01 for the Combined License Application, dated May 19, 2009**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
08.03.01-1	L-0390	Response enclosed – see following pages
08.03.01-2	L-0391	Response enclosed – see following pages

NRC Letter No.: LEVY-RAI-LTR-042

NRC Letter Date: May 19, 2009

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 08.03.01-1

Text of NRC RAI:

RAI-SRP 8.3-EEB-01

FSAR Section 8.3.1.1.7 describes the grounding system. The staff notes that Regulatory Guide 1.204 endorses IEEE Std. 665 for Generating Station grounding. This standard is included in the same section of the DCD. Although IEEE Std. 80 is referenced in IEEE Std. 665 and Regulatory Guide 1.204, please confirm that the use of IEEE Std. 80 did not invalidate the LNP compliance with the Regulatory Guide 1.204 guidance, or explain why this guidance document was not followed.

LNP RAI ID #: L-0390

PGN Response to NRC RAI:

FSAR Section 8.3.1.1.7 describes the use of methodology outlined in IEEE 80 for the design of the site specific grounding grid system.

The IEEE Std. 80 methodology was used in the determination of ground grid conductor size for the Levy site and does not invalidate compliance with Regulatory Guide 1.204.

The FSAR APPENDIX 1AA CONFORMANCE WITH REGULATORY GUIDES includes RG 1.204 Rev.0 applicability to LNP with no exceptions.

Associated LNP COL Application Revisions:

No COLA revisions have been identified associated with this response.

Attachments / Enclosures:

None.

NRC Letter No.: LEVY-RAI-LTR-042

NRC Letter Date: May 19, 2009

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 08.03.01-2

Text of NRC RAI:

RAI-SRP 8.3-EEB-02

FSAR Section 8.3.1.1.8 describes lightning protection. This section refers to RG 1.204. In FSAR Section 8.1, Table 8.1-201 it is stated that RG 1.204 is implemented via IEEE Standard 665. The Regulatory Guide also endorses IEEE Std. 666-1991, IEEE Std. 1050-1996 and IEEE Std. C62.23-1995. Please discuss the applicability of these other standards.

LNP RAI ID #: L-0391

PGN Response to NRC RAI:

The FSAR APPENDIX 1AA CONFORMANCE WITH REGULATORY GUIDES includes RG 1.204 REV.0 applicability to LNP with no exceptions. IEEE Std. 665, IEEE Std. 666, IEEE Std. 1050, and IEEE Std. C62.23 will be complied with in accordance with RG 1.204.

The FSAR section 8.1, Table 8.1-201 will be revised to remove the note: Implemented via IEEE-665, "IEEE Guide for Generating Station Grounding" (DCD section 8.3, Reference 201) under the 'Remarks' column for RG 1.204.

Associated LNP COL Application Revisions:

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

Remove the note under the 'Remarks' column for RG 1.204 in Table 8.1-201 on page 8.1-3 (Section 8.1).

Attachments / Enclosures:

None.