



Serial: NPD-NRC-2010-026  
March 25, 2010

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  
SUPPLEMENT 2 TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER  
NO. 025 RELATED TO QUALITY ASSURANCE PROGRAM DESCRIPTION**

- References:
1. Letter from Brian C. Anderson (NRC) to James Scarola (PEC), dated October 3, 2008, "Request for Additional Information Letter No. 025 Related to SRP Section 17.5 for the Shearon Harris Units 2 and 3 Combined License Application"
  2. Letter from Garry D. Miller (PEC) to U. S. Nuclear Regulatory Commission (NRC), dated November 6, 2008, "Response to Request for Additional Information Letter No. 025 Related to Quality Assurance Program Description," Serial: NPD-NRC-2008-058
  3. Letter from Garry D. Miller (PEC) to U. S. Nuclear Regulatory Commission (NRC), dated April 13, 2009, "Supplement 1 to Response to Request for Additional Information Letter No. 025 Related to Quality Assurance Program Description," Serial: NPD-NRC-2009-067

Ladies and Gentlemen:

Progress Energy Carolinas, Inc. (PEC) hereby submits a supplemental response to the Nuclear Regulatory Commission's (NRC) request for additional information provided in Reference 1.

A revised response to one of the NRC questions (17.5-2) 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 (727) 820-4481.

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

Executed on March 25, 2010.

Sincerely,

John Elnitsky  
Vice President  
Nuclear Plant Development  
Progress Energy Florida, Inc.  
P.O. Box 14042  
St. Petersburg, FL 33733

D094  
NRC

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Enclosure

cc : U.S. NRC Region II, Regional Administrator  
U.S. NRC Resident Inspector, SHNPP Unit 1  
Mr. Brian Hughes, U.S. NRC Project Manager

**Shearon Harris Nuclear Power Plant Units 2 and 3  
Supplement 2 to Response to NRC Request for Additional Information Letter No. 025  
Related to SRP Section 17.5 for the Combined License Application,  
dated October 3, 2008**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
17.5-1	H-0393	April 13, 2009; Serial NPD-NRC-2009-067
17.5-2	H-0394	Revised response enclosed – see following pages
17.5-3	H-0077	November 6, 2008; Serial NPD-NRC-2008-058
17.5-4	H-0078	November 6, 2008; Serial NPD-NRC-2008-058

**NRC Letter Number:** HAR-RAI-LTR-025

**NRC Letter Date:** October 3, 2008

**NRC Review of Final Safety Analysis Report**

**NRC RAI #:** 17.5-2

**Text of NRC RAI:**

The Progress QAPD Section 2 states that the QAPD applies to those quality-related activities that involve the functions of safety-related activities of structures, systems, and components (SSCs) as described in the COL Final Safety Analysis Report. The staff notes that Appendix B to 10 CFR Part 50 requires, in part, that Part 52 applicants include in the FSAR a description of the quality assurance [program] applied to the design, and to be applied to the fabrication, construction, and testing of the SSCs of the facility and to the managerial and administrative controls to be used to assure safe operations. Please revise the language in this section to conform to this requirement.

Also, the current language in this section seems to indicate that safety-related SSCs are described in the FSAR. Please identify the corresponding FSAR section. Otherwise, please clarify the purpose of this text and/or modify it accordingly.

**PGN RAI #:** H-0394

**PGN Response to NRC RAI:**

Progress Energy in its effort to support the objectives of standardization and remain consistent with the industry and the NuStart reference plant activities will prepare a revision to the Progress Energy QAPD to be consistent with the NRC approved template NEI 06-14A rev 7, Quality Assurance Program Description, for the format and content of standard and site specific sections. NEI 06-14A rev 7, accepted for use by NRC via U.S. Nuclear Regulatory Commission Final Safety Evaluation for Technical Report NEI 06-14, "Quality Assurance Program Description," Revision 7, November 3, 2009, addresses this RAI on standard text. Progress Energy will incorporate the standard text changes associated with Section II of the approved NEI 06-14A rev 7 into a revision of the QAPD as noted below.

**Associated HAR COL Application Revisions:**

Section II, of the Progress Energy QAPD second paragraph currently reads:

The objective of the QAPD is to assure that new PGN nuclear generating plants are designed constructed and operated in accordance with governing regulations and license requirements. The program is based on the requirements of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," as further described in this document. The QAPD applies to those quality-related activities that involve the functions of safety-related structures, systems, and components (SSCs) associated with the design, licensing, construction and operation of new nuclear power plants as described in the COL Final Safety Analysis Report. A list or system identifying SSCs and activities to which this program applies is maintained at the appropriate facility. The Design Certification Document is used as the basis for this list. Cost and scheduling functions do not prevent proper implementation of the QAPD.

Section II, of the Progress Energy QAPD second paragraph will be revised to read:

The objective of the QAPD is to assure that PGN's nuclear generating plants are designed, constructed, and operated in accordance with governing regulations and license requirements. The program is based on the requirements of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," as further described in this document. The QAPD applies to those quality-related activities that involve the functions of safety-related structures, systems, and components (SSCs) associated with the design (excluding Design Certification activities), fabrication, construction, and testing of the SSCs of the facility and to the managerial and administrative controls to be used to assure safe operations. Examples of COL program safety-related activities include, but are not limited to, site-specific engineering related to safety-related SSCs, site geotechnical investigations, site engineering analysis, seismic analysis, and meteorological analysis. A list or system that identifies SSCs and activities to which this program applies is maintained at the appropriate facility. The Design Certification Document is used as the basis for this list. Cost and scheduling functions do not prevent proper implementation of the QAPD.

**Attachments / Enclosures:**

None.