



Serial: NPD-NRC-2010-042  
June 16, 2010

10CFR52.79

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

**LEVY NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 52-029 AND 52-030  
SUPPLEMENT 1 TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER  
NO. 079 RELATED TO OFFSITE POWER SYSTEM**

- References:
1. Letter from Tanya Simms (NRC) to Garry Miller (PEF), dated January 7, 2010, "Request for Additional Information Letter No. 079 Related to SRP Section 08.02 for the Levy County Nuclear Plant Units 1 and 2 Combined License Application"
  2. Letter from John Elnitsky (PEF) to U. S. Nuclear Regulatory Commission (NRC), dated February 5, 2010, "Response to Request for Additional Information Letter No. 079 Related to Offsite Power System", NPD-NRC-2010-014

Ladies and Gentlemen:

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

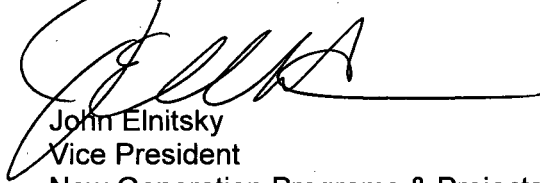
A revised response to one of the NRC questions (08.02-9) is addressed in the enclosure. The enclosure also identifies a change that will be made in a future revision of the Levy Nuclear Plant Units 1 and 2 application.

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (727) 820-4481.

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

Executed on June 16, 2010.

Sincerely,



John Elnitsky  
Vice President  
New Generation Programs & Projects

Enclosure

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

Progress Energy Florida, Inc.  
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D094  
NRC

**Levy Nuclear Plant Units 1 and 2  
Supplement 1 to Response to NRC Request for Additional Information Letter No. 079  
Related to SRP Section 08.02 for the Combined License Application,  
Dated January 7, 2010**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
08.02-8	L-0684	February 5, 2010; NPD-NRC-2010-014
08.02-9	L-0814	Revised response enclosed – see following pages

**NRC Letter No.:** LNP-RAI-LTR-079

**NRC Letter Date:** January 7, 2010

**NRC Review of Final Safety Analysis Report**

**NRC RAI NUMBER:** 08.02-9

**Text of NRC RAI:**

In response to RAI 8.2-5, pertaining to routing of power, control, and instrument cables, it is stated that high voltage connections between the AP1000 power block and the switchyard are routed overhead. It is also stated that, "Power, control and instrumentation cables that are routed underground from the AP1000 power block to the switchyard will have moisture/water resistant jackets. Manholes for duct bank access that are below the ground water level will have sump pumps." However, this response does not meet the intent of Generic Letter 2007-01 to describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support equipment and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule). Indicate whether there are any plans to implement a program for inaccessible or underground power cables for testing and inspection; and indicate the frequency for such testing and inspection or provide justification for not developing such program.

**PGN RAI ID #:** L-0814

**PGN Response to NRC RAI:**

This RAI requested additional information based on Generic Letter (GL) 2007-01 and 10 CFR 50.65. GL 2007-01 is addressed in COLA Part 02, Chapter 1. GL 2007-01 will be considered as part of 10 CFR 50.65 maintenance rule (MR) program implementation. The MR program will not be implemented until prior to Fuel Load; as such, specific information necessary to determine appropriate inspections, tests and monitoring is not available at this time. In order to determine the method and frequency, a review of detailed design and procurement information is needed. NUREG/CR-7000 provides detailed recommendations on implementing a cable condition monitoring program. This NUREG was released in January of 2010 and has not been evaluated at this time. However, the latest industry experience and other available information, including NUREG/CR-7000, will be followed in developing a cable condition monitoring program as part of the maintenance rule program. A description of this aspect of the maintenance rule program will be added to the FSAR in response to this RAI as shown below.

**Associated LNP COL Application Revisions:**

COLA Part 2, FSAR Chapter 17, Section 17.6, will be revised to include the following new paragraph at the end of the section with a left margin annotation (LMA) of STD SUP 17.6-2:

Condition monitoring of underground or inaccessible cables is incorporated into the maintenance rule program. The cable condition monitoring program incorporates lessons learned from industry operating experience, addresses regulatory guidance, and utilizes information from detailed design and procurement documents to determine the appropriate inspections, tests and monitoring criteria for underground and

inaccessible cables within the scope of the maintenance rule (i.e., 10 CFR 50.65). The program takes into consideration Generic Letter 2007-01.

**Attachments/Enclosures:**

None.