



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

July 29, 2011

Mr. John Elnitsky
Vice President, Nuclear Plant Development
Progress Energy Carolinas, Inc.
P.O. Box 14042
Saint Petersburg, FL 33733

Dear Mr. Elnitsky:

My staff has reviewed the Progress Energy proposed Shearon Harris Expansion project emissions documentation sent to the North Carolina Division of Air Quality (NCDAQ) by your office for purposes of General Air Quality Conformity. The project resides in Wake County, which is in maintenance for Carbon Monoxide (CO) and Ozone.

It has been demonstrated that the direct and indirect emissions changes due to the project are greater than the threshold of 100 tons per year for CO and the ozone precursor nitrogen oxides (NO_x), as specified in the Code of Federal Regulations (CFR) Part 40 93.153(b) and NCAC 2D.1603(d) and therefore is considered a significant project for the purposes of conformity.

The NCDAQ has determined that the CO emissions from the project can safely be considered to conform with the existing CO maintenance State Implementation Plan (SIP) for the Triangle area. However, the estimated NO_x emissions from the construction of Shearon Harris units 2 and 3 are approximately 21% of the estimated nonroad mobile source construction emission in the Triangle area maintenance SIP for the 1997 8-hour ozone standard. This is a significant percentage of the construction emissions budget and the NCDAQ has concluded that the 1997 8-hour ozone maintenance SIP for the Triangle area has to be revised in order to account for this construction project.

The NCDAQ believes that the project emission estimates supplied by Progress Energy is conservative and as such can be accounted for applying a portion of the safety margin available in the 1997 8-hour ozone maintenance SIP to the appropriate nonroad mobile source categories. According to 40 CFR 93.158(a)(5)(i)(B), a commitment letter from the NCDAQ to revise the maintenance SIP must be submitted to the United States Environmental Protection Agency (USEPA) in order for this project to comply with State and Federal conformity rules. The NCDAQ has submitted this commitment letter to the USEPA and a copy of the letter is attached.

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Thank you again for the opportunity to review the Shearon Harris Expansion. If you have any questions, please feel free to contact Laura Boothe at (919) 733-1988.

Sincerely,

A handwritten signature in cursive script that reads "Sheila C. Holman".

Sheila C. Holman

SCH/lab

Attachment

cc: Laura Boothe
Scott Davis, USEPA
Donald Palmrose, USNRC
Monte Matthews, USACE