



February 24, 2012
Serial: HNP-12-028

10 CFR 50.90

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Shearon Harris Nuclear Power Plant, Unit No. 1
Docket No. 50-400 / Renewed License No. NPF-63

Subject: License Amendment Request for Revision to Technical Specification Core
Operating Limits Report for Realistic Large Break LOCA Analysis
TAC No. ME6999
Request for Withholding of Proprietary Information

Reference: Letter from K. Holbrook to the U.S. NRC, "License Amendment Request for
Revision to Technical Specification Core Operating Limits Report," Serial
HNP-11-067 dated August 22, 2011, ADAMS Accession No. ML11238A077

Ladies and Gentlemen:

By letter dated August 22, 2011, Carolina Power & Light Company (CP&L), doing business as Progress Energy Carolinas, Inc., requested approval from the U.S. Nuclear Regulatory Commission (NRC) of a license amendment request (LAR). The proposed request would revise TS 6.9.1.6, "Core Operating Limits Report," to add a plant-specific methodology that implements AREVA's NRC-approved topical report EMF-2103(P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," Revision 0, and also EMF-2103(P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors," Revision 2 or higher upon approval of the specific revision by the NRC.

A meeting with CP&L and NRC staff, related to the referenced LAR, was held on January 11, 2012. CP&L provided a handout at that meeting, attached to this letter in Enclosure 2, containing information considered proprietary to AREVA NP Inc. On behalf of AREVA NP, CP&L requests that the NRC withhold the information in accordance with 10 CFR 2.390 per the affidavit for withholding proprietary information, Enclosure 1. Upon removal of Enclosure 2, the balance of this letter and enclosures are decontrolled. Enclosure 3 contains a non-proprietary version of the handout.

Please refer any questions regarding this submittal to me at (919) 362-3137.

Sincerely,

A handwritten signature in black ink, appearing to read "David H. Corlett". The signature is fluid and cursive, with the first name "David" and last name "Corlett" clearly distinguishable.

David H. Corlett
Supervisor, Licensing/Regulatory Programs
Harris Nuclear Plant

DHC/jrc

Enclosures (3): Request for Withholding of Proprietary Information

cc: Mr. J. D. Austin, NRC Sr. Resident Inspector, HNP
Ms. A. T. Billoch Colón, NRC Project Manager, HNP
Mr. V. M. McCree, NRC Regional Administrator, Region II

HNP-12-028

Shearon Harris Nuclear Power Plant, Unit No. 1
Docket No. 50-400 / Renewed License No. NPF-63

License Amendment Request for Revision to Technical
Specification Core Operating Limits Report References for
Realistic Large Break LOCA Analysis
TAC No. ME6999
Request for Withholding of Proprietary Information

Enclosure 1

Affidavit Supporting Withholding of Proprietary Information

AFFIDAVIT

COMMONWEALTH OF VIRGINIA)
) ss.
CITY OF LYNCHBURG)

1. My name is Gayle F. Elliott. I am Manager, Product Licensing, for AREVA NP Inc. (AREVA NP) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in viewgraphs presented to the NRC at a meeting between Progress Energy, AREVA NP and the NRC on January 11, 2012 entitled "Harris Realistic LBLOCA Question Response Meeting," and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

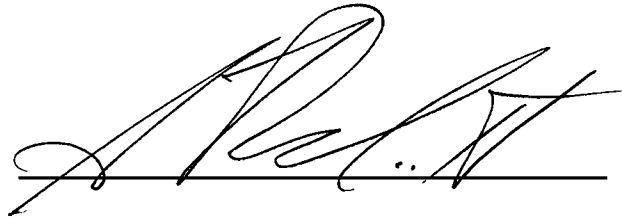
- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

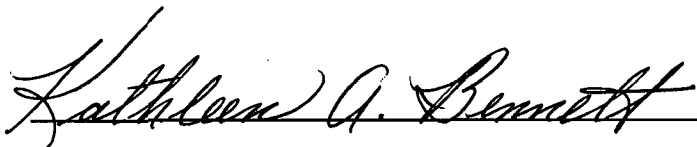
7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document have been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge,
information, and belief.

A handwritten signature in black ink, appearing to be 'S. Bennett', written over a horizontal line.

SUBSCRIBED before me this 22nd
day of February, 2012.

A handwritten signature in black ink, reading 'Kathleen A. Bennett', written over a horizontal line.

Kathleen Ann Bennett
NOTARY PUBLIC, COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES: 8/31/15
Reg. # 110864

