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10 CFR 170.11

April 12, 2017
Serial: HNP-17-035

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

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

Subject: Request for Pilot Plant Status and Fee Waiver to Implement Tornado Missile
Risk Evaluator

Ladies and Gentlemen:

This letter requests the Nuclear Regulatory Commission (NRC) to grant pilot plant status and a fee waiver to Duke Energy Progress, LLC (Duke Energy), for Shearon Harris Nuclear Power Plant, Unit 1 (HNP), for the use of a risk-informed methodology known as the Tornado Missile Risk Evaluator (TMRE). TMRE will be used to resolve tornado missile protection compliance issues. As part of the pilot program, Duke Energy will submit a license amendment request for use of TMRE at HNP.

The Nuclear Energy Institute and the industry have been developing a new methodology to evaluate the risk associated with tornado missiles on unprotected components. TMRE is a departure from a method of evaluation described in the Final Safety Analysis Report used in establishing the design basis, as defined in 10 CFR 50.59, requiring NRC review and approval. Licensees would be able to submit a license amendment request to use TMRE to bring these unprotected components into tornado missile protection compliance if the NRC approves the request.

The purpose of TMRE is to present the NRC with a Regulatory Guide 1.174 risk-informed option for evaluating the risk posed by tornado missiles at any site and determine whether additional physical protection is required. The need for TMRE originated with the NRC's issuance of Regulatory Issue Summary 2015-06, which informed licensees of plants identified as not being in conformance with their tornado missile licensing basis. This methodology is proposed as a vehicle for resolving low risk compliance issues and risk informing plant-specific design requirements.

Duke Energy requests that the review fees associated with the NRC evaluation of the pilot plant license amendment request be waived pursuant to 10 CFR 170.11 on the basis that the request is to assist in developing NRC regulatory guidance to endorse implementation of TMRE in accordance with 10 CFR 170.11(b). In its application, Duke Energy plans to apply TMRE to a variety of systems, structures, and components at HNP to assure commonality and consistency in treatment within the methodology.

This document contains no new regulatory commitments.

Please refer any questions regarding this submittal to Mr. Jeff Robertson, Regulatory Affairs Manager, at (919) 362-3137.

Sincerely,

A handwritten signature in cursive script that reads "Tanya M. Hamilton". The signature is written in black ink and is positioned above the printed name.

Tanya M. Hamilton

cc: NRC Sr. Resident Inspector, Harris Nuclear Plant
NRC Project Manager, Harris Nuclear Plant
NRC Regional Administrator, Region II

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