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 ROBINSON, W.R.      Carolina Power & Light Co.  
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SUBJECT: Submits info explaining how NRC questions applied to licensee re ECCS changes as discussed in meeting w/SPC & affected utils on 961016.

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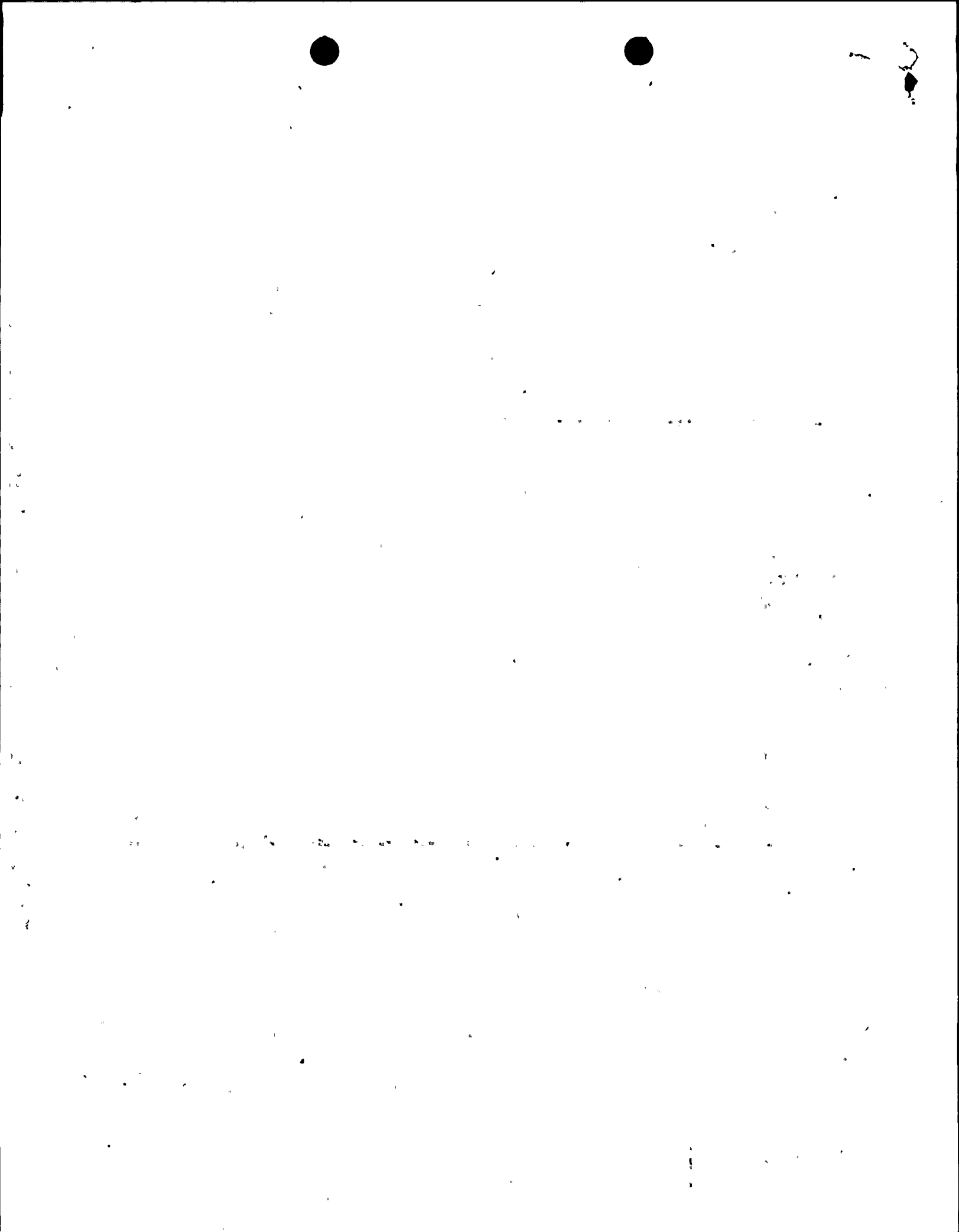
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SERIAL: HNP-96-184  
10CFR50.46

OCT 24 1996

United States Nuclear Regulatory Commission  
ATTENTION: Document Control Desk  
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SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO: NPF-63  
EMERGENCY CORE COOLING SYSTEM EVALUATION CHANGES

Dear Sir or Madam:

In our letter of September 19, 1996, Carolina Power and Light (CP&L) reported changes to the Large Break Loss of Coolant Analysis (LBLOCA) for Harris Nuclear Plant (HNP) per the requirements of 10CFR50.46. Subsequent to that submittal, the NRC informed Siemens Power Corporation (SPC) that the modifications incorporated into the LBLOCA evaluation model in 1991 were unacceptable. As reported in the September 19, 1996 letter, the HNP LBLOCA Analysis of Record uses the 1986 LBLOCA evaluation model with the Fuel Cooling Test Facility (FCTF) reflood heat transfer correlation. Therefore, there is no impact to HNP with respect to the NRC disapproval of the 1991 evaluation model.

However, the NRC also informed Siemens Power Corporation (SPC) that the approved 1986 LBLOCA evaluation model contained an unacceptable error in the FCTF reflood heat transfer correlation over the range of reflood velocities between approximately 1.00 to 1.77 inches/second.

SPC has notified CP&L that the peak cladding temperature (PCT) for the HNP LBLOCA does not occur in the reflood region in question. The HNP limiting PCT of 1982 °F occurs at 58.03 seconds with a reflood rate of 2.2 inches/second. Since the HNP reflood rate does not drop below the 1.77 inches/second until 73 seconds, the HNP analysis is not impacted by the questions raised by the NRC.

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2. The second part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is essential for ensuring the integrity of the financial statements and for providing a clear audit trail. The document also notes that proper record-keeping is a key component of good internal control.

At a meeting with SPC and affected utilities on October 16, 1996, the NRC verbally requested that each licensee submit a docketed letter explaining how the NRC's questions applied to the licensee. This letter is being submitted as requested. If you have any questions regarding this matter, please contact Ms. Donna Alexander at (919) 362-3190.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. B. Brady".

DBA/dba

c: Mr. J. B. Brady, HNP Senior Resident Inspector, NRC  
Mr. S. D. Ebnetter, Region II Regional Administrator, NRC  
Mr. N. B. Le, NRR Project Manager, NRC



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