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 ROBINSON, W.R. Carolina Power & Light Co.
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SUBJECT: Responds to GL 97-01, "Degradation of Control Rod Drive Mechanism Nozzle & Other Vessel Closure Head Penetrations."

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 TITLE: GL-97-01 Degradation of Control Rod Drive Mechanism & Other Vessel

NOTES: Application for permit renewal filed. 05000400

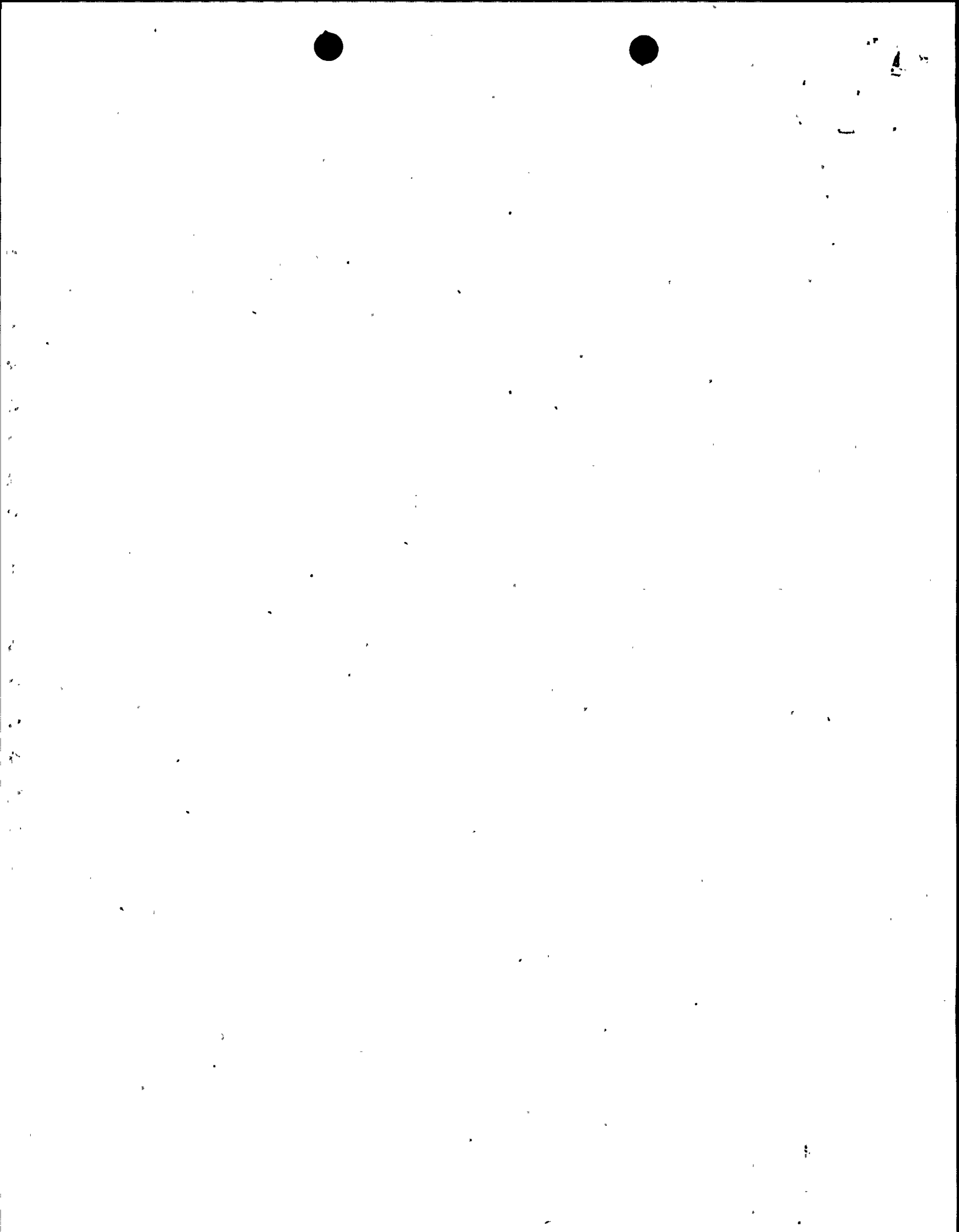
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Carolina Power & Light Company
PO Box 165
New Hill NC 27562

William R. Robinson
Vice President
Harris Nuclear Plant

APR 25 1997

SERIAL: HNP-97-087
10 CFR 50.54(f)

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
RESPONSE TO NRC GENERIC LETTER 97-01, "DEGRADATION OF CONTROL ROD
DRIVE MECHANISM NOZZLE AND OTHER VESSEL CLOSURE HEAD
PENETRATIONS"

Dear Sir or Madam:

Carolina Power & Light Company (CP&L) hereby responds to NRC Generic Letter 97-01, "Degradation of Control Rod Drive Mechanism Nozzle and Other Vessel Closure Head Penetrations," for the Harris Nuclear Plant (HNP).

The generic letter requested each licensee to provide a written report, within 120 days of the date of the generic letter, that includes the following information for its facility:

1. Regarding inspection activities:

- 1.1 A description of all inspections of CRDM nozzle and other VHPs performed to the date of the generic letter, including the results of these inspections.
- 1.2 If a plan has been developed to periodically inspect the CRDM nozzle and other VHPs:
 - a. Provide the schedule for first, and subsequent, inspections of the CRDM nozzle and other VHPs, including the technical basis for this schedule.
 - b. Provide the scope for the CRDM nozzle and other VHP inspections, including the total number of penetrations (and how many will be inspected), which penetrations have thermal sleeves, which are spares, and which are instrument or other penetrations.

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- 1.3 If a plan has not been developed to periodically inspect the CRDM nozzle and other VHPs, provide the analysis that supports why no augmented inspection is necessary.
 - 1.4 In light of the degradation of CRDM nozzle and other VHPs described above, provide the analysis that supports the selected course of action as listed in either 1.2 or 1.3, above. In particular, provide a description of all relevant data and/or tests used to develop crack initiation and crack growth models, the methods and data used to validate these models, the plant-specific inputs to these models, and how these models substantiate the susceptibility evaluation. Also, if an integrated industry inspection program is being relied on, provide a detailed description of this program.
2. Provide a description of any resin bead intrusions, as described in IN 96-11, that have exceeded the current EPRI PWR Primary Water Chemistry Guidelines recommendations for primary water sulfate levels, including the following information:
- 2.1 Were the intrusions cation, anion, or mixed bed?
 - 2.2 What were the durations of these intrusions?
 - 2.3 Does the plant's RCS water chemistry Technical Specifications follow the EPRI guidelines?
 - 2.4 Identify any RCS chemistry excursions that exceed the plant administrative limits for the following species: sulfates, chlorides or fluorides, oxygen, boron, and lithium.
 - 2.5 Identify any conductivity excursions which may be indicative of resin intrusions. Provide a technical assessment of each excursion and any followup actions.
 - 2.6 Provide an assessment of the potential for any of these intrusions to result in a significant increase in the probability for IGA of VHPs and any associated plan for inspections.

The generic letter requested that addressees submit a written response within 30 days of the date of the generic letter indicating: (1) whether or not the requested information will be submitted, and (2) whether or not the requested information will be submitted within the requested time period.

HNP will submit the requested information within the requested time period. This information will be submitted on or before July 29, 1997.

Please refer any questions regarding this submittal to Ms. D. B. Alexander at (919) 362-3190.

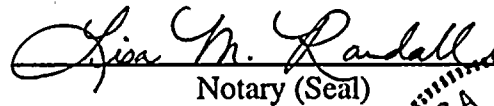
Sincerely,



KWS/kws

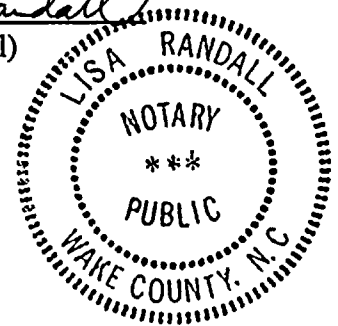
Enclosure

W. R. Robinson, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.



Notary (Seal)

My commission expires: 6-7-98



- c: Mr. J. B. Brady, NRC Sr. Resident Inspector
- Mr. N. B. Le, NRC Project Manager
- Mr. L. A. Reyes, NRC Regional Administrator

bc: Mr. H. K. Chernoff (RNP)
Mr. B.H. Clark
Mr. G. W. Davis
Mr. J. W. Donahue
Ms. S. F. Flynn
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