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 ROBINSON, W.R. Carolina Power & Light Co.
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SUBJECT: Discusses commitment to Joint Owners Group Program, MPR-1807,
 rev 2 re GL 96-05, "Periodic Verification of Design-Basis
 Capability of Safety-Related MOVs."

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NOTES: Application for permit renewal filed. 05000400 E

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MAY



Carolina Power & Light Company
 PO Box 165
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William R. Robinson
 Vice President
 Harris Nuclear Plant

JUN 12 1998

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

Serial: HNP-98-082
 10 CFR 50.54(f)

SHEARON HARRIS NUCLEAR POWER PLANT
 DOCUMENT NO. 50-400/LICENSE NO. NPF-63
 GENERIC LETTER 96-05, "PERIODIC VERIFICATION OF DESIGN-BASIS CAPABILITY OF
 SAFETY-RELATED MOTOR-OPERATED VALVES"
 COMMITMENT TO JOG PROGRAM, MPR-1807 REV.2

Sir or Madam:

On October 30, 1997, the Nuclear Regulatory Commission issued the below referenced Safety Evaluation (SE), which within the conditions and limitations described in the SE, stated that the Staff considers the Joint Owners' Group (JOG) Program on MOV Periodic Verification an acceptable industry-wide response to Generic Letter (GL) 96-05.

The JOG had agreed that after the issuance of the SE, requests would be made for participating utilities to notify the NRC of their plans to implement the JOG program described in Revision 2 of Topical Report MPR-1807, which was the subject of the SE and that any deviations from the JOG program would be justified. By this letter, Carolina Power and Light Company's Harris Nuclear Plant (HNP) is providing the requested SE response.

HNP committed to implementing a MOV periodic verification program that would be consistent with Topical Report MPR-1807 in a letter to the NRC dated March 14, 1997. HNP plans to continue participating in the JOG MOV Periodic Verification Program as a Westinghouse Owners Group (WOG) participant and to implement the program elements described in Topical Report MPR-1807, Rev. 2 with the exception noted below.

HNP plans to deviate from the JOG program in regards to the interim static testing as described in Section 4 of Topical Report MPR-1807. HNP plans to perform MOV static tests during the upcoming fall 1998 outage that would satisfy the original GL 89-10 commitment to periodically static test the program MOVs on a frequency of every 3 refueling outages or 5 years. After completion of the fall 1998 outage, the program MOVs that received an initial static baseline test per GL 89-10, will have had the opportunity to be re-tested under static conditions for periodic verification. The interim static test approach described in Topical Report MPR-1807, Rev. 2 will be implemented for the scheduled spring 2000 outage. HNP does plan to dynamically test the assigned MOVs during the fall 1998 outage per the JOG Periodic Verification program.

To implement the interim static testing frequency as specified in MPR-1807, Rev. 2, HNP will assign a risk ranking category to program MOVs that is consistent with the risk ranking methodology submitted to the NRC by the WOG in letter OG-97-127, dated December 19, 1997, Engineering Report V-EC-1658.

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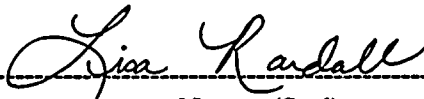
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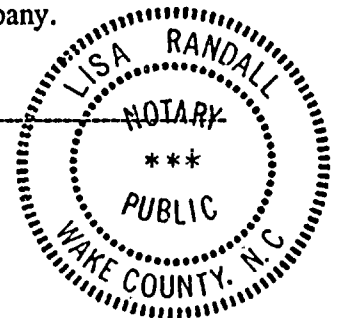
This letter supersedes prior communications regarding periodic verification testing commitments for either GL 96-05 or GL 89-10. If you have any questions or need additional information regarding this matter, please contact Mr. J. H. Eads at (919) 362-2646.

Sincerely,



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)



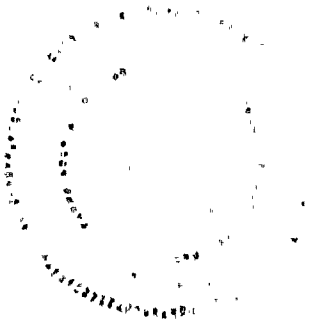
My commission expires: 6-7-2003

References:

- a. Safety Evaluation on Joint Owners' Group Program on Periodic Verification of Motor-Operated Valves Described in Topical Report MPR-1807, Rev. 2, dated July 1997 (WOG Letter OG-97-085, 8/12/97)
- b. Generic Letter 96-05, "Periodic Verification of Design-Basis Capability of Safety-Related Motor-Operated Valves", dated 9/18/96

MV

- c: Mr. J. B. Brady (HNP Senior NRC Resident)
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