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 AUTH. NAME AUTHOR AFFILIATION
 CUTTER, A. B. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards "Elimination of Arbitrary Intermediate Break Points in Main Feedwater Sys," Justifying alternate to SRP 3.6.2 (MEB 3-1) guidelines re postulated arbitrary intermediate pipe breaks. Review & approval by Mar 1985 requested.

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Page 11

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Carolina Power & Light Company

FEB 13 1985

SERIAL: NLS-85-028

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NO. 1 - DOCKET NO. 50-400
ELIMINATION OF POSTULATED ARBITRARY INTERMEDIATE
BREAKS IN THE MAIN FEEDWATER SYSTEM

- REFERENCE: (1) Letter dated November 30, 1984. S. R. Zimmerman to H. R. Denton. Subject: "Elimination of Postulated Arbitrary Intermediate Pipe Breaks in Class 1, 2, and 3 Pipes."
- (2) U. S. Nuclear Regulatory Commission. "Catawba Nuclear Station Unit 2 Safety Evaluation for the Elimination of Arbitrary Intermediate Pipe Breaks." March 1984.

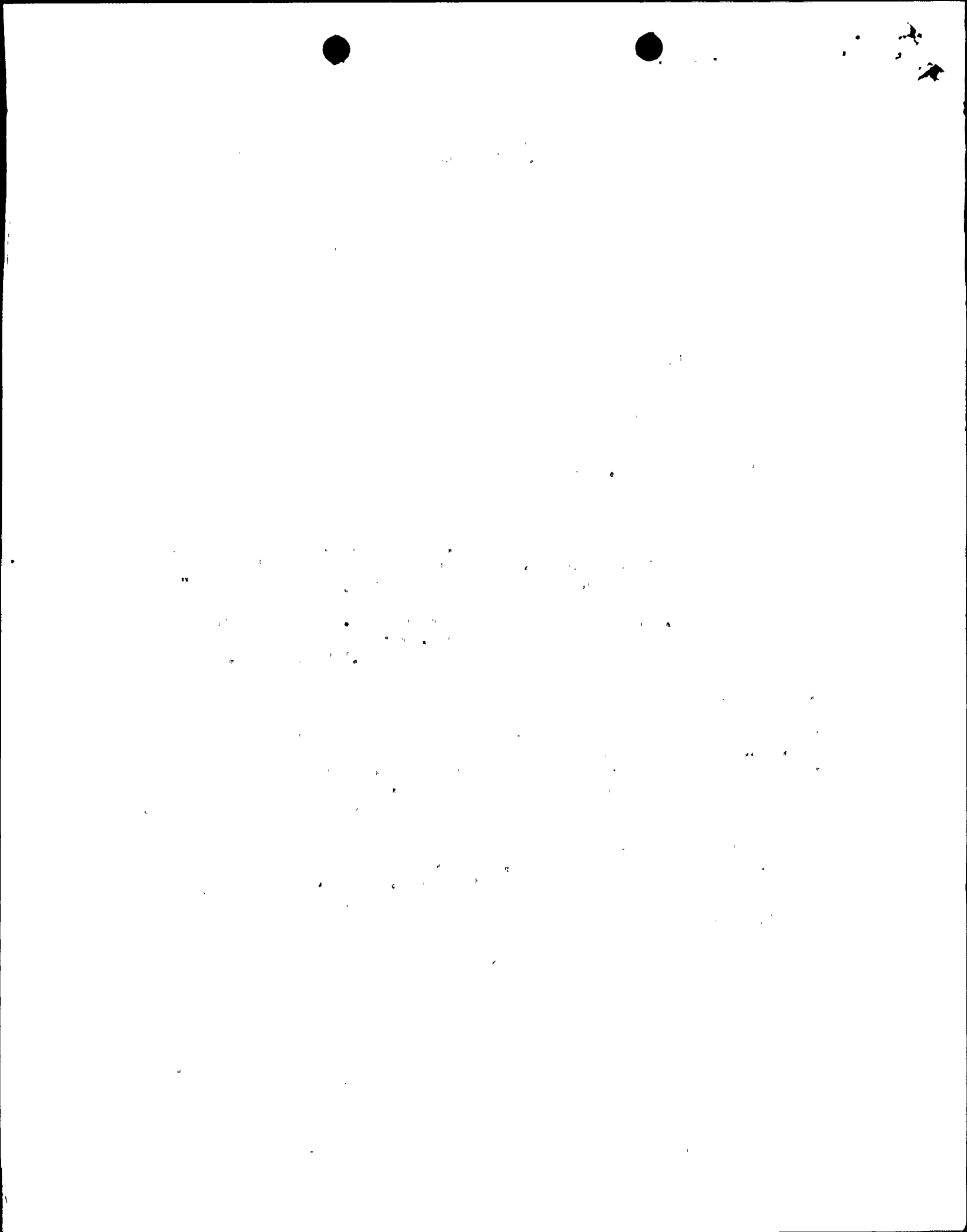
Dear Mr. Denton:

Carolina Power & Light Company requests Nuclear Regulatory Commission approval for the use of an alternate approach to the existing guidelines in Standard Review Plan 3.6.2 (MEB 3-1) regarding the postulation of arbitrary intermediate pipe breaks. We informed the NRC in Reference 1 of the ongoing work for the elimination of postulated arbitrary intermediate pipe breaks.

The enclosure to this letter presents the technical basis for the elimination of the breaks. Based on our review, we conclude that an adequate level of safety exists to justify the proposed deviation. This conclusion is consistent with the consensus in the nuclear industry and with the NRC conclusions presented in Reference 2.

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We request the NRC to review and approve this request by March 1985. We are available to meet with the Staff to resolve any questions and provide any necessary information.

If you have any questions, please contact Mr. Pedro Salas at (919) 836-8015.

Yours very truly,



A. B. Cutter - Vice President
Nuclear Engineering & Licensing

PS/mf (1083PSA)

Enclosure: Elimination of Arbitrary Intermediate Break
Points in the Main Feedwater System

cc: Mr. R. J. Bosnak (NRC-NRR/DE)	Mr. Wells Eddleman
Mr. H. L. Brammer (NRC-NRR/DE)	Mr. John D. Runkle
Mr. B. C. Buckley (NRC)	Dr. Richard D. Wilson
Mr. G. F. Maxwell (NRC-SHNPP)	Mr. G. O. Bright (ASLB)
Mr. J. P. O'Reilly (NRC-RII)	Dr. J. H. Carpenter (ASLB)
Mr. Travis Payne (KUDZU)	Mr. J. L. Kelley (ASLB)
Mr. Daniel F. Read (CHANGE/ELP)	
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