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MAY ¥ 1975

Carolina Power & Light Company

May 5, 1975

Mr. Benard C. Rusche, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

File Cy.

RE: DOCKET NOS. 50-400, 50-401, 50-402 and 50-403

Dear Mr. Rusche:

On March 24, 1975, Carolina Power & Light Company submitted Amendment Number 41 to the Shearon Harris Nuclear Power Plant PSAR. In this amendment, we provided our company positions on regulatory guides issued through July 1974. We also committed to submit our position on Regulatory Guide 1.79, "Preoperational Testing of Emergency Core Cooling Systems for Pressurized Water Reactors," as soon as Ebasco Services and Westinghouse had completed their evaluation. Our position is as follows:

The SHNPP Project will comply with Regulatory Guide 1.79 (6-74), "Preoperational Testing of Emergency Core Cooling Systems for Pressurized Water Reactors," with the following clarifications/ exceptions:

Reg. Position

Clarifications/Exceptions

- C.3.a.(2) The capability of the HPSI to deliver as required under accident conditions will be verified by analysis based on as-built HPSI pump and system head-capacity curves. Operation of the check valves and the auxiliary feedwater system will be demonstrated through testing.
- C.3.b.(2) The capability to realign values for recirculation will be tested for all SHNPP units. Tests of the system to demonstrate vortex control in the RHR sump, acceptable pressure drops across screening and suction lines and values, and adequate NPSH will be conducted for Unit 1 only and referenced for the remaining units. However, if LPSI recirculation tests are conducted in other plants with similar sumps and/or RHR systems prior to SHNPP preoperational testing, those tests may be referenced in lieu of testing SHNPP Unit 1.



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Senard C. Rusche

C.3.c.(1) Blowdown will be into the open reactor vessel at ambient pressure. This condition will allow the rapid accumulator dump which is necessary for evaluation of the system performance. Proper initiation of accumulator dump will be demonstrated by testing the accumulator check valves as described in Regulatory Position C.3.c.(3).

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- C.3.c.(3) Initial RCS pressure for this test will be greater than the normal accumulator precharge pressure but less than the normal RCS operating pressure.
- C.4.b.(3) Maximum expected temperature is taken to mean the normal operating temperature.

Carolina Power & Light Company will change its PSAR to reflect the above regulatory guide position in its next amendment.

Yours very truly, J. A. Jones

Executive Vice President Engineering, Construction & Operation

JAJ/nc/ap1

Lancaster, CJr

Secretary

Sworn to and subscribed before me this 5th day of May, 1975.

Margart M. Cor Notary Public

My Commission Expires: July 4, 1975

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