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 CUTTER, A. B. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Informs that deletion of short duration data re application of Arrhenius methodology evaluated & equipment found qualified in response to NRC 851119-21 audit of environment qualification program.

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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
ENVIRONMENTAL QUALIFICATION OF ELECTRICAL EQUIPMENT
NRC AUDIT

Dear Mr. Denton:

On November 19-21, 1985, your Staff audited the Shearon Harris Environmental Qualification Program. We are very pleased that our efforts to produce a good program have not gone unnoticed by the NRC. Mr. Armando Masciantonio, the lead reviewer, indicated during the exit meeting that he considered our program a good program, that things were in good shape, and that every item they reviewed could be considered qualified. He had two concerns as a result of his review: the application of the Arrhenius methodology, and the need for positive statements in the qualification packages indicating that the equipment is qualified for its application. The purpose of this letter is to address the resolution of these concerns.

Mr. Masciantonio expressed some concerns regarding the application of Arrhenius methodology to extrapolate test data of short duration to show long-term post-accident qualification. Our program had considered short test times (1 to 4 hours) combined with post-accident test times of longer duration (50 to 100 hours) to qualify equipment for long-term post-accident operability. We have evaluated the deletion of this short duration data and have found no equipment unqualified.

He also indicated that each qualification package should contain a positive statement indicating that the equipment is qualified for its application. In our judgement, our procedures address this concern since they require the evaluation of plant-specific operability requirements against test results. However, we have no objection to include a positive statement in the packages indicating that the equipment is qualified for its application. This effort is underway and should be completed by January 15, 1986.

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We hope that this information is helpful in your evaluation of the Shearon Harris Environmental Qualification Program. If you have any questions with regard to this issue, please contact Mr. Pedro Salas at (919) 836-8015.

Yours very truly,



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

ABC/PS/mf (3171PSA)

cc: Mr. B. C. Buckley (NRC)
Mr. A. Masciantonio (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
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Mr. Travis Payne (KUDZU)
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