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JUN 14 2000

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

SERIAL: HNP-00-088

**SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
SUPPLEMENTAL INFORMATION - VENTILATION REQUIREMENTS**

Dear Sir or Madam:

On April 7, 2000, Harris Nuclear Plant (HNP) submitted a proposed license amendment for a revision to the Technical Specifications (TS). The proposed amendment revises TS 3/4.7.6, "Control Room Emergency Filtration System", 3/4.7.7 "Reactor Auxiliary Building Emergency Exhaust System", 3/4.9.12 "Fuel Handling Building Emergency Exhaust System" and associated Bases. Specifically, HNP proposes to revise these TS to provide an Action when the Control Room Emergency Filtration System or Reactor Auxiliary Building Emergency Exhaust System ventilation boundary is inoperable and a note that allows an applicable ventilation boundary to be open, intermittently under administrative controls. Additionally, HNP proposes to modify TS 3/4.3.3.1 "Radiation Monitoring for Plant Operations" to provide consistency between the applicability of the Control Room Emergency Filtration System and the radiation monitors that initiate a Control Room Isolation signal.

On May 2, 2000 the NRC issued License Amendment No. 98 to the HNP TS, which revised multiple TS pages and resulted in changes to TS Section 4.7.6, "Control Room Emergency Filtration System", TS 4.7.7, "Reactor Auxiliary Building Emergency Exhaust System", and TS 4.9.12, "Fuel Handling Building Emergency Exhaust System". Issuance of Amendment 98 independently affected pages 3/4 7-15, 3/4 7-17 and 3/4 7-18 from the April 7, 2000 request, which is currently under NRC review. Additionally, HNP is proposing to add the word "intermittently" to the note in the Limiting Conditions for Operation (LCO) for the proposed TS 3/4.7.6, 3/4.7.7, and 3/4.9.12. "Intermittently" is in the Bases section of the applicable TS for the proposed change but HNP is proposing adding the word in the note for the LCOs to provide clarity.

This supplemental information does not affect the conclusions of either the 10 CFR 50.92 evaluation or the Environmental Considerations submitted as part of HNP's April 7, 2000 letter.

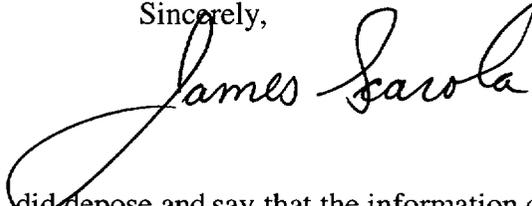
Enclosure 1 contains the retyped TS pages which incorporate changes resulting from the issuance of Amendment No. 98 and the addition of the word "intermittently" in the note for the LCO.

A501

CP&L requests that the proposed amendment be issued such that implementation will occur within 60 days of issuance to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications.

Please refer any questions regarding this submittal to Mr. E. A. McCartney at (919) 362-2661.

Sincerely,

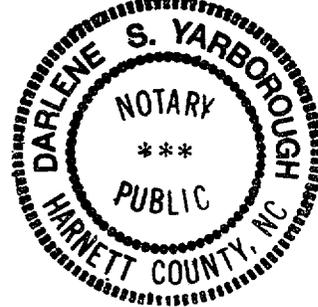


J. Scarola, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief, and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.



Notary (Seal)

My commission expires: 2-21-2005



MSE/mse

- c: Mr. J. B. Brady, NRC Sr. Resident Inspector
- Mr. Mel Fry, Director, NC DEHNR
- Mr. R. J. Laufer, NRC Project Manager
- Mr. L. A. Reyes, NRC Regional Administrator

ENCLOSURE TO SERIAL: HNP-00-088

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
SUPPLEMENTAL INFORMATION - VENTILATION REQUIREMENTS

TECHNICAL SPECIFICATION PAGES

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6 Two independent Control Room Emergency Filtration Systems shall be OPERABLE.*

- APPLICABILITY:
- a. MODES 1, 2, 3, and 4
 - b. MODES 5 and 6
 - c. During movement of irradiated fuel assemblies and movement of loads over spent fuel pools

ACTION:

- a. MODES 1, 2, 3 and 4:

-----NOTE-----
In addition to the Actions below, perform Action c. if applicable.

- 1. With one Control Room Emergency Filtration System inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- 2. With two Control Room Emergency Filtration Systems inoperable due to an inoperable control room boundary, restore the control room boundary to OPERABLE status within 24 hours. Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- b. MODES 5 and 6

-----NOTE-----
In addition to the Actions below, perform Action c. if applicable.

- 1. With one Control Room Emergency Filtration System inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE Control Room Emergency Filtration System in the recirculation mode.
- 2. With both Control Room Emergency Filtration Systems inoperable, or with the OPERABLE Control Room Emergency Filtration System required to be in the recirculation mode by ACTION b.1., not capable of being powered by an OPERABLE emergency power source, suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel.

* The control room boundary may be opened intermittently under administrative controls as described in the Bases.

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION (Continued)

- c. During movement of irradiated fuel assemblies or movement of loads over spent fuel pools.
 1. With one Control Room Emergency Filtration System inoperable, restore the inoperable system to OPERABLE status within 7 days or initiate and maintain operation of the remaining OPERABLE Control Room Emergency Filtration System in the recirculation mode.
 2. With both Control Room Emergency Filtration Systems inoperable, or with the OPERABLE Control Room Emergency Filtration System required to be in the recirculation mode by Action c.1., not capable of being powered by an OPERABLE emergency power source, suspend all operations involving movement of irradiated fuel assemblies or movement of loads over spent fuel pools.

SURVEILLANCE REQUIREMENTS

4.7.6 Each Control Room Emergency Filtration System shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating;
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following significant painting, fire, or chemical release in any ventilation zone communicating with the system by:
 1. Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Position C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 4000 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1980; and
 2. Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, has a methyl iodide penetration of \leq 0.5% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989.

PLANT SYSTEMS

CONTROL ROOM EMERGENCY FILTRATION SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, has a methyl iodide penetration of $\leq 0.5\%$ when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989.
- d. At least once per 18 months by:
 - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 5.1 inches water gauge while operating the system at a flow rate of 4000 cfm $\pm 10\%$;
 - 2. Verifying that, on either a Safety Injection or a High Radiation test signal, the system automatically switches into an isolation with recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks;
 - 3. Verifying that the system maintains the control room at a positive pressure of greater than or equal to 1/8 inch Water Gauge at less than or equal to a pressurization flow of 315 cfm relative to adjacent areas during system operation;
 - 4. Verifying that the heaters dissipate 14 ± 1.4 kW when tested in accordance with ANSI N510-1980; and
 - 5. Deleted.
- e. After each complete or partial replacement of a HEPA filter bank, by verifying that the unit satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the system at a flow rate of 4000 cfm $\pm 10\%$; and
- f. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the cleanup system satisfies the in-place penetration leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 4000 cfm $\pm 10\%$.

PLANT SYSTEMS

3/4.7.7 REACTOR AUXILIARY BUILDING (RAB) EMERGENCY EXHAUST SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.7 Two independent RAB Emergency Exhaust Systems shall be OPERABLE.*

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one RAB Emergency Exhaust System inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With two RAB Emergency Exhaust Systems inoperable due to an inoperable RAB Emergency Exhaust System boundary, restore the RAB Emergency Exhaust System boundary to OPERABLE status within 24 hours. Otherwise, be in at least HOT STANDBY within the next 6 hours and COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.7 Each RAB Emergency Exhaust System shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating;
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following significant painting, fire, or chemical release in any ventilation zone communicating with the system by:
 1. Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the unit flow rate is 6800 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1980;
 2. Verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, has a methyl iodine penetration of \leq 2.5% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989.

* The RAB Emergency Exhaust Systems boundary may be opened intermittently under administrative controls as described in the Bases.

PLANT SYSTEMS

REACTOR AUXILIARY BUILDING (RAB) EMERGENCY EXHAUST SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

- c. After every 720 hours of charcoal adsorber operation, by verifying, within 31 days after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, has a methyl iodide penetration of $\leq 2.5\%$ when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989.
- d. At least once per 18 months by:
 - 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber bank is less than 4.1 inches water gauge while operating the unit at a flow rate of $6800\text{ cfm} \pm 10\%$.
 - 2. Verifying that the system starts on a Safety Injection test signal.
 - 3. Verifying that the system maintains the areas served by the exhaust system at a negative pressure of greater than or equal to $1/8$ inch water gauge relative to the outside atmosphere.
 - 4. Verifying that the filter cooling bypass valve is locked in the balanced position, and
 - 5. Verifying that the heaters dissipate $40 \pm 4\text{ kW}$ when tested in accordance with ANSI N510-1980.
- e. After each complete or partial replacement of a HEPA filter bank, by verifying that the unit satisfies the in-place penetration leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a DOP test aerosol while operating the unit at a flow rate of $6800\text{ cfm} \pm 10\%$; and
- f. After each complete or partial replacement of a charcoal adsorber bank, by verifying that the unit satisfies the in-place penetration leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the unit at a flow rate of $6800\text{ cfm} \pm 10\%$.

REFUELING OPERATIONS

3/4.9.12 FUEL HANDLING BUILDING EMERGENCY EXHAUST SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.12 Two independent Fuel Handling Building Emergency Exhaust System Trains shall be OPERABLE.*

APPLICABILITY: Whenever irradiated fuel is in a storage pool.

ACTION:

- a. With one Fuel Handling Building Emergency Exhaust System Train inoperable, fuel movement within the storage pool or crane operation with loads over the storage pool may proceed provided the OPERABLE Fuel Handling Building Emergency Exhaust System Train is capable of being powered from an OPERABLE emergency power source and is in operation and discharging through at least one train of HEPA filters and charcoal adsorber.
- b. With no Fuel Handling Building Emergency Exhaust System Trains OPERABLE, suspend all operations involving movement of fuel within the storage pool or crane operation with loads over the storage pool until at least one Fuel Handling Building Emergency Exhaust System Train is restored to OPERABLE status.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.12 The above required Fuel Handling Building Emergency Exhaust System trains shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 10 continuous hours with the heaters operating;
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following significant painting, fire, or chemical release in any ventilation zone communicating with the system by:
 1. Verifying that the cleanup system satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c, and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the unit flow rate is 6600 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1980.

* The Fuel Handling Building Emergency Exhaust System boundary may be opened intermittently under administrative controls as described in the Bases.