



Carolina Power & Light Company  
Harris Nuclear Plant  
PO Box 165  
New Hill NC 27562

JAN 19 2001

SERIAL: HNP-01-008

Mr. Michael E. Ernestes, Region II  
United States Nuclear Regulatory Commission  
Sam Nunn Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
Atlanta, GA 30303-8931

SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
EXEMPTION REQUEST – OPERATOR REQUALIFICATION PROGRAM CYCLE

Dear Mr. Ernestes:

The Harris Nuclear Plant's (HNP) current Operator Requalification Program cycle began January 1, 2000 and ends December 31, 2001. HNP is scheduled to be in an extended shutdown for refueling, steam generator replacement, and power uprate modifications during the end period of the current requalification cycle and when the full annual examination (comprehensive written examination and annual operating test) would need to be given. 10 CFR 55.11 allows the Commission to grant specific exemptions from the regulations. The purpose of this letter is to request a one time exemption from the requirements of 10 CFR 55.59(a) that would allow the comprehensive written examinations for the current requalification cycle to be given in the first quarter of 2002 outside of the 24 month cycle. HNP will administer an operating test in the first quarter of 2001 for license holders. If the exemption is granted, it will also be our intent to short cycle the next 24 month period to 15 months to maintain our annual examinations in the first quarter of the year. HNP will administer another full annual examination in the first quarter of 2003 to complete the short cycle.

Reason for the Exemption Request

CP&L requests this exemption for the following reasons:

- 10CFR 55.59(a) requires a comprehensive requalification written examination and an annual operating test within the 24 month operator requalification cycle.
- The current requalification cycle started in January 2000 and will be completed December 2001.
- The full annual examination to be given at the end of the current cycle falls in a time frame when the HNP will be in an extended shutdown to perform refueling, steam generator replacement and power uprate modifications.
- Based on the training required for new site procedures, modification of the simulator to support outage modifications, training prior to the outage and the implementation of the extended outage, the ability to complete the full annual examination within the 24 month requalification cycle is not possible.

*per: Rich  
Kauter*

*Not in ADAMS  
as of 2/21/01.  
MOB 3/10*

- HNP is requesting that the full annual examination for the current requalification cycle be given in the first quarter of 2002 outside of the 24 month cycle required by 10CFR 55.59(a).
- Since the requested action would result in exceeding the requirements of 10CFR 55.59(a), a one time exemption from the requirement is requested.

#### Basis for this Exemption Request

10 CFR 55.11 states that "The Commission may, upon application by an interested person, or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property and are otherwise in the public interest." HNP is requesting a one time exemption that would allow the full annual examination for the current requalification cycle (01/2000 – 12/2001) to be given in the first quarter of 2002 outside of the 24 month cycle required by 10CFR 55.59(a). This exemption request deals only with the examination scheduling, as such, the granting of the request would not endanger life or property nor would it be contrary to public interest. Granting of this exemption will not reduce the effectiveness of the current Operator Requalification Program for the HNP.

#### Supplemental Information

The timetable information below describes specific site activities, which impact the implementation of the full annual examination for the current 24 month cycle.

01/2001 – 03/2001 – Administration of Operating Test

03/2001 – 06/2001 – Conduct training on rewritten AOP' and EOP's

06/2001 – 07/2001 – Simulator outage to install modification for power uprate and steam generator replacement

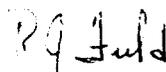
07/2001 – 09/2001 – Train operators on required outage training, power uprate and steam generator modifications; classroom and simulator training

09/2001 – 12/2001 – Refueling outage. Outage is planned to start September 22, 2001 and end early December

01/2002 - 03/2002 – Implement full annual examination

If you have any questions regarding this request, please contact Mr. Andy Barbee at (919) 362-3313.

Sincerely,



R. J. Field

Manager, Regulatory Affairs  
Harris Nuclear Plant

MGW

- c: Mr. J. B. Brady (NRC Senior Resident Inspector, HNP) w/o Enclosure  
Mr. Rich Laufer (NRR Project Manager, HNP) w/o Enclosure  
Mr. L. A. Reyes (NRC Regional Administrator, Region II) w/o Enclosure