

J. 50.59 Screen/Evaluation

ok

2

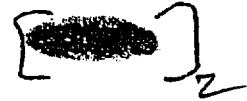
Identification No: 02-0695	Revision No: 0	Page 1 of 8
Attachment 1 Screen		
Plant Applicability	<input type="checkbox"/> BNP <input type="checkbox"/> CR3 <input checked="" type="checkbox"/> HNP <input type="checkbox"/> RNP	
Implementing Document No. [REDACTED]	Revision No: 0	
Implementing Activity Description:		
This activity modifies the wall between the [REDACTED] Room and the [REDACTED] Room to make it a three hour rated fire barrier.		
[REDACTED]		
<p>The HNP Fire Protection Program licensing basis is described in the Operating License (FOL) NPF-63, Section 2.F, Fire Protection Program, which states:</p> <p>"Carolina Power and Light shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the Safety Evaluation Report (SER) dated November 1983 (and supplements 1 through 4), and the Safety Evaluation dated January 12, 1987, subject to the following provision below:</p> <p>"The licensees may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire."</p> <p>The Code of Federal Regulation, 10 CFR 50.59 Changes, Tests and Experiments, was recently revised. To reduce duplication of effort, 10CFR50.59(c)(4) specifically excludes from the scope of 10 CFR 50.59 changes to the facility or procedures that are controlled by more specific requirements and criteria that are established by other regulations. Fire Protection is specifically mentioned as one of the areas excluded from the 10 CFR 50.59 scope. The basis for the exclusion of fire protection from 10 CFR 50.59 is the fact that fire protection program changes are made in accordance with the license conditions and procedures that control changes to the program. These conditions allow changes to the program plan that do not adversely affect post-fire safe shutdown capability.</p> <p>The revised 10 CFR 50.59 regulatory requirements have been adopted by Progress Energy and are currently implemented in Procedure REG-NGGC-0010, 10CFR50.59 Reviews. Accordingly, the changes shall be documented in accordance with Procedure REG-NGGC-0010 and the Fire Protection Review Checklist.</p> <p>Based on the review of the NUREG-0800 fire protection and safe shutdown requirements and clarifications of Generic Letter 81-12, it has been concluded that the proposed changes pertaining to the creation of a new plant fire area (Fire Area 1-A-ACP) separate from the [REDACTED] and the revised HNP SSD Analysis Calculation E-5525 to support the revised plant configuration does not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire as described in [REDACTED] and the proposed changes can be made without prior NRC approval. However, this modification is made to resolve an NRC violation and therefore it is submitted to the NRC for review and concurrence prior to EC closure (Ref. NRC Letter EA-00-022, Final</p>		

Rebut
in between
FOL
4512

2

2

FF-5



Significance Determination for a White Finding and Notice of Violation Shearon Harris Nuclear Power Plant - NRC Inspection Report 50-400/00-09).

Identification No: 02-0695

Revision No: 0

Page 2 of 8

SECTION 1: Predetermination

1a Is a change to the Technical Specifications or Operating License necessary to implement the proposed activity?

Yes

☐

Initiate a change in accordance with applicable procedure and go to Section 2

No

☒

Continue to the next question

1b Is the proposed activity fully bounded by a previously completed screen or evaluation performed in accordance with REG-NGGC-0010?

Or

Yes

☐

Enter the Reference below and go to Section 4

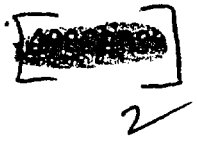
No

☒

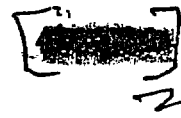
Go to Section 2

1c Has the proposed activity been formally approved by the NRC?

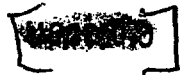
Reference:



Identification No: 02-0695	Revision No: 0	Page 3 of 8
Attachment 1 Screen		
SECTION 2: Applicability of Regulatory Processes Other Than 10 CFR 50.59		
Address the questions below for all aspects of the activity. If the answer is "Yes" for any portion of the activity, complete the associated attachment (e.g. Question 3 and Attachment 3). Note that it is not unusual to have more than one process apply to a given activity.		
	Yes	No
2 Does the proposed activity involve a change to the Emergency Plan or an Emergency Plan implementing procedure needed to comply with the requirements of 10 CFR 50 Appendix E? (Attachment 2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3 Does the proposed activity involve a change to the Security Plan, the Safeguards Contingency Plan or the Security Personnel Training and Qualification Plan? (Attachment 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4 Does the proposed activity involve a change to the Quality Assurance Program Description? (Attachment 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5 Does the proposed activity involve a change to the Fire Protection Program? (Attachment 5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6 Does the proposed activity involve a change to the licensed operator requalification program? (Attachment 6)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7 Does the proposed activity involve a change in thermal or chemical effluents, involve a change to the Environmental Protection Plan, or involve a significant change to land use that could impact the environment? (Attachment 7)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8 Does the proposed activity involve a change to the Emergency Response Data System? (Attachment 8)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9 [RNP Only - A response to this question is not to be provided by Evaluators at BNP, CR3, and HNP] Does the implementing activity affect the ISFSI? (Attachment 9)	<input type="checkbox"/>	<input type="checkbox"/>
Are all aspects of the activity controlled by one or more of the Regulatory Processes identified in question 1a and questions 2 through 9 above?	<input checked="" type="checkbox"/> Complete the required attachments and go to Section 4	<input type="checkbox"/> Complete the required attachments and go to Section 3

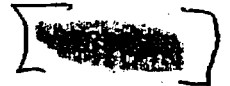


Identification No: 02-0695		Revision No: 0		Page 4 of 8	
Attachment 1 Screen					
SECTION 3: 10 CFR 50.59 Screen					
		Yes		No	
10a	Does the proposed activity involve a change to an SSC that adversely affects any FSAR-described design function?	<input type="checkbox"/>		<input type="checkbox"/>	
10b	Does the proposed activity involve a change to a procedure that adversely affects how any FSAR-described SSC design functions are performed or controlled?	<input type="checkbox"/>		<input type="checkbox"/>	
10c	Does the proposed activity involve revising or replacing any FSAR-described evaluation methodology that is used in establishing the design bases or used in the safety analyses?	<input type="checkbox"/>		<input type="checkbox"/>	
10d	Does the proposed activity involve a test or experiment not described in the FSAR, where an SSC is utilized or controlled in a manner that is outside the reference bounds of the design for that SSC or is inconsistent with analyses or descriptions in the FSAR?	<input type="checkbox"/>		<input type="checkbox"/>	
Are any of these questions (10a, 10b, 10c, or 10d) answered "Yes?"		<input type="checkbox"/> Complete and attach Attachment 10 and go to Section 4		<input type="checkbox"/> Enter Justification and References below and go to Section 4	
Justification: Changes addressed under Attachment 5, Fire Protection Program.					
References: See Attachment 5					



2

Identification No: 02-0695	Revision No: 0	Page 5 of 8
Attachment 1 Screen		
SECTION 4: Signatures and Distribution		
Evaluator: <u>Chris Georgeson</u>	(Print/Sign)	Date: <u>6/17/02</u>
Reviewer: <u>Vinod Puri</u>	(Print/Sign)	Date: <u>7/17/02</u>
Supervisor: <u>Ron Vamer</u>	(Print/Sign)	Date: _____
Additional Reviews (if required)		
Reviewer: <u>David McAfee</u>	(Print/Sign)	Date: <u>7/17/02</u>
Reviewer: <u>Mike Fletcher</u>	(Print/Sign)	Date: <u>7/16/02</u>
Reviewer: <u>N/A</u>	(Print/Sign)	Date: <u>N/A</u>



2

Identification No: 02-0695	Revision No: 0	Page <u>6</u> of <u>8</u>
----------------------------	----------------	---------------------------

**Attachment 5
Fire Protection Program Screening Evaluation**

Plant Applicability: ☐ BNP ☐ CR3 ☒ HNP ☐ RNP

Implementing Document No: 

Revision No: 0

1. Will the proposed activity adversely affect the ability to achieve and maintain safe shutdown in the event of a fire, including, but not limited to; required safe shutdown equipment, communications equipment, and emergency lighting?

YES

☐

NO

☒

Justification and references:

This activity resolves an NRC violation concerning a 40% degradation of the T-Lag fire barrier



Reback
in between
- with
NSR



2

Identification No: 02-0695	Revision No: 0	Page 7 of 8
----------------------------	----------------	-------------

Redact

[Redacted]

the results of this analysis show that safe shutdown can be achieved and maintained for the new fire area [Redacted] after completion of this activity. *ok to include*

References: [Redacted] NUREG 0800 Section 9.5.1 of July 1981, NRC Generic Letter 81-12 and clarifications, NRC Letter EA-00-022, Final Significance Determination for a White Finding and Notice of Violation Shearon Harris Nuclear Power Plant - NRC Inspection Report 50-400/00-09) [Redacted] AOP-036

2. Will the proposed activity adversely affect the Fire Protection Program or fire prevention measures, including but not limited to; control and extinguishment, separation, fire barriers, curbs and drains, control of ignition sources and combustible loading, fire fighting capability, or post-fire shutdown operations?

YES ☐ NO ☒

Justification and references:

The Fire Protection Program and fire prevention measures, including but not limited to; control and extinguishment, separation, fire barriers, curbs and drains, control of ignition sources and combustible loading, fire fighting capability, or post-fire shutdown operations are strengthened by this activity because a new 3-hour rated concrete and penetration seal fire barrier is installed to sub-divide a previously analyzed area in a manner designed to provide separation for cabling important to post fire safe shutdown.

Redact in between

[Redacted]

[Redacted]

This modification does not change or impact installed fire detection systems in the areas and there are no installed fire suppression systems. Access to and locations of hose stations and fire extinguishers are not changed. All modified penetration seals, fire dampers, and doors have been added to the fire protection program. This activity also specifies a new safe shutdown strategy and an electrical safe shutdown analysis for the new fire area. Fire fighting guidance for the new fire area is also provided through a revised pre-fire plan.

References: [Redacted] SSA (Calculations [Redacted]), NUREG 0800 Section 9.5.1 of July 1981, NRC Generic Letter 81-12 and clarifications, NRC Letter EA-00-022, Final Significance Determination for a White Finding and Notice of Violation (Shearon Harris Nuclear Power Plant - NRC Inspection Report 50-400/00-09) [Redacted] AOP-036

Identification No: 02-0695	Revision No: 0	Page <u>8</u> of <u>8</u>
If the proposed activity adversely affects the ability to achieve and maintain safe shutdown in the event of a fire, PNSC review [BNP, CR3, HNP] and NRC approvals are required prior to implementation.		
Evaluator: <u>[Chris Georoeson (SSA)]</u>	(Print/Sign)	Date: <u>6/17/02</u>
Evaluator: <u>[Mike Fletcher (FP)]</u>	(Print/Sign)	Date: <u>7/16/02</u>
Reviewer: <u>[David McAfee]</u>	(Print/Sign)	Date: <u>7/17/02</u>