



Progress Energy

MAY 05 2004

U.S. Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

Serial: HNP-04-071
10 CFR 50.90

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
TECHNICAL SPECIFICATION SURVEILLANCE
REQUIREMENTS (SR) 4.0.5.A AND ASSOCIATED BASES

Ladies and Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power and Light Company doing business as Progress Energy Carolinas, Inc., requests a license amendment for the Harris Nuclear Plant (HNP) to Technical Specification Surveillance Requirements (SR) 4.0.5.a, "Surveillance Requirements for inservice inspection and testing of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components." Specifically, the proposed change adds a reference to the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) in Technical Specification SR 4.0.5.a and the associated Bases. HNP is submitting the proposed change to update the Technical Specifications to allow use of the ASME OM Code for visual examination of snubbers.

In addition to the license amendment, HNP requests approval, pursuant to 10 CFR 50.55a(g)(4)(iv), to use the 1995 Edition with 1996 Addenda of the ASME OM Code for the visual examination of snubbers. HNP will use all related requirements of the respective edition and addenda in the ASME OM Code as required by 10 CFR 50.55a(g)(4)(iv) for the visual examination of snubbers.

With respect to this proposed change, HNP has reviewed the proposed license amendment against the criteria of 10 CFR 51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration. In addition, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. Based on the foregoing, HNP concludes that the proposed change to the Technical Specifications meets the eligibility criteria for categorical exclusion delineated in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement is required for approval of this application.

Attachment 1 provides the description, background, and technical analysis for the proposed change to the Technical Specifications.

Progress Energy Carolinas, Inc.
Harris Nuclear Plant
P.O. Box 165
New Hill, NC 27562

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Attachment 2 details, in accordance with 10 CFR 50.91(a), the basis for HNP's determination that the proposed change to the Technical Specifications does not involve a significant hazards consideration.

Attachment 3 provides the proposed Technical Specifications change.

Attachment 4 provides the revised Technical Specifications page.

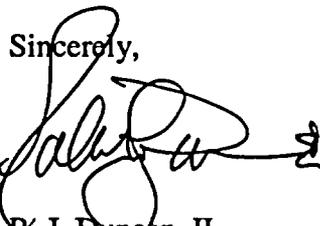
Attachment 5 provides the proposed Technical Specifications Bases change (for information).

In accordance with 10 CFR 50.91(b), HNP is providing the State of North Carolina with a copy of the proposed license amendment.

HNP requests that the proposed amendment be issued prior to September 1, 2004 to support planning for HNP RFO-12 which is scheduled for October 16, 2004.

Please refer any question regarding this submittal to Mr. John Caves at (919) 362-3137.

I declare, under penalty of perjury, that the attached information is true and correct
(Executed on **MAY 05 2004**).

Sincerely,


R. J. Duncan, II
Director – Site Operations
Harris Nuclear Plant

RJD/jpy

Attachments:

1. Description, Background, and Technical Analysis
2. 10 CFR 50.92 Evaluation
3. Proposed Technical Specifications Change
4. Revised Technical Specifications Page
5. Proposed Technical Specifications Bases Change

c:

Mr. R. A. Musser, NRC Senior Resident Inspector
Ms. B. O. Hall, N.C. DENR Section Chief
Mr. C. P. Patel, NRC Project Manager
Mr. L. A. Reyes, NRC Regional Administrator

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ASSOCIATED BASES**

DESCRIPTION, BACKGROUND, AND TECHNICAL ANALYSIS

Introduction

The proposed License Amendment Request revises Technical Specification Surveillance Requirements (SR) 4.0.5.a and the associated Technical Specification Bases. These changes are necessary to reference the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code).

Description

This letter is a request to amend the Harris Nuclear Plant (HNP) Technical Specifications. The proposed change revises Technical Specification SR 4.0.5.a, Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components, to include a reference to the ASME OM Code in addition to Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g).

The proposed change to Technical Specification SR 4.0.5.a will add the words "and/or the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code)" to the fourth line between the words "Code" and "applicable."

Currently, Technical Specification SR 4.0.5.a states:

"Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief had been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);"

The proposed change is to add a reference to Technical Specification SR 4.0.5.a as follows:

"Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and/or the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief had been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);"

Background

Harris Nuclear Plant Technical Specification SR 4.0.5 describes Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as the Surveillance Requirements for inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves.

HNP requests approval of the proposed change to support adoption of the 1995 Edition with 1996 Addenda of the ASME OM Code, Subsection ISTD, for the visual examination of snubbers, which is the applicable Code of ASME OM Code Case OMN-13. HNP proposes to adopt this Code Case for the Fall 2004 refueling outage (RFO-12). This Code Case was recently approved (June 2003) in Regulatory Guide 1.192, Operation and Maintenance Code Case Acceptability, ASME OM Code.

Technical Analysis

The purpose of augmented snubber visual examination program is to demonstrate that each snubber is operable. Inservice inspections shall be visual examinations performed for impaired functional ability due to physical damage, leakage, corrosion, or degradation from environmental exposures or operating conditions. Visual examinations verify that (1) there are no visible indications of damage that impair operability, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers that are found unacceptable may be tested and test results which satisfy the operability test criteria may be used to recategorize the snubber(s) as acceptable, provided the testing can resolve the unacceptable condition.

At HNP, prior to startup in May 1987, within 10 months of startup, and during each outage for the first three fuel cycles, 100% of the snubbers were inspected. Prior to RFO-4, an alternate examination schedule per NRC Generic Letter 90-09 was incorporated into the FSAR, PLP-106 Attachment 4, and procedures that extended snubber visual examination intervals to every other outage, based on a limited number of visual examination failures. The entire population of snubbers was subsequently inspected every other outage (RFOs-5, 7, and 9). Starting in RFO-10, the examination population was divided to approximately one-half each outage to evenly distribute the snubber visual examinations per outage.

The examination results for approximately the past 10 years have resulted in only one visual examination failure (due to personnel stepping on a small mechanical snubber during RFO-9). The examination results are as follows:

RFO-5	0 visual failures
RFO-7	0 visual failures
RFO-9	1 visual failure
RFO-10	0 visual failures

Technical Analysis (continued)

The current, 2nd interval HNP ISI program was developed in accordance with the 1989 Edition (no Addenda) of ASME Boiler and Pressure Vessel Code, Section XI. Subarticles IWF-1200 and IWF-5300 require the examination and testing of snubbers per the first Addenda of ASME / ANSI OM-1987, Part 4 (published in 1988), generally referred to as "OM-4." HNP Relief Request 2RG-008, Revision 1, was authorized by the NRC by letter dated June 18, 1999. This relief performs snubber testing and examination in accordance with Technical Specification 3/4.7.8 in lieu of the ASME OM-4 Code.

The 1995 Edition with 1996 Addenda of the ASME OM Code, Subsection ISTD, is the applicable Code per Code Case OMN-13. HNP plans to utilize the 1995 Edition with 1996 Addenda of the ASME OM Code for snubber visual examinations as an approved alternative to the snubber visual examination requirements of the 1989 Edition of ASME Section XI and as modified by HNP Relief Request 2RG-008, Revision 1. Code Case OMN-13 has been evaluated and approved by the NRC in Reg Guide 1.192, Operation and Maintenance Code Case Acceptability, ASME OM Code (June 2003).

Conclusion:

HNP has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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10 CFR 50.92 NO SIGNIFICANT HAZARDS EVALUATION

A written evaluation of the significant hazards consideration of a proposed license amendment is required by 10 CFR 50.92. Harris Nuclear Plant (HNP) has evaluated the proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92, a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety

The basis for this determination is presented below.

DETERMINATION OF SIGNIFICANT HAZARDS FOR THE PROPOSED CHANGE

The proposed License Amendment Request revises Technical Specification Surveillance Requirements (SR) 4.0.5.a and the associated Technical Specification Bases. These changes are necessary to reference the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code).

In accordance with 10 CFR 50.92, HNP has reviewed the attached proposed change and has concluded that it does not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed change does not involve a SHC is as follows:

- 1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed changes to the Technical Specification SR 4.0.5.a and the associated Bases are requested to add a reference to the ASME OM Code and applicable Addenda for inservice inspection of ASME Code Class 1, 2, and 3 components.

The existing Technical Specifications requires inservice inspection of ASME Code Class 1, 2, and 3, components and inservice testing of ASME Code Class 1, 2 and 3 pumps and

valves as required by 10 CFR 50.55a. The purposes of the inservice inspection and inservice testing programs are to assess the operational readiness of pumps and valves, to detect degradation that might affect component operability, and to maintain safety margins with provisions for increased surveillance and corrective action. 10 CFR 50.55a defines the requirements for applying industry codes and standards to each licensed nuclear power facility. The initial HNP ISI program was developed in accordance with NRC regulations (10 CFR 50.55a(g)(4)(i)) to comply with the 1983 Edition of the ASME Boiler and Pressure Vessel Code, including Addenda through the Summer of 1983 and is reflected in the existing Technical Specifications and associated Bases sections.

The current, second ten-year interval HNP ISI program was developed in accordance with the 1989 Edition (no Addenda) of ASME Boiler and Pressure Vessel Code, Section XI. Subarticles IWF-1200 and IWF-5300 require the examination and testing of snubbers per the first Addenda of ASME / ANSI OM-1987, Part 4 (published in 1988), generally referred to as "OM-4." HNP Relief Request 2RG-008, Revision 1, grants HNP the ability to retain the snubber testing and examination program in Technical Specification 3/4.7.8.

The 1995 Edition with 1996 Addenda of the ASME OM Code, Subsection ISTD, is the applicable Code per Code Case OMN-13. HNP plans to utilize the 1995 Edition with 1996 Addenda of the ASME OM Code for snubber visual examinations as an approved alternative to the snubber visual examination requirements of the 1989 Edition of ASME Section XI and as modified by HNP Relief Request 2RG-008, Revision 1. Code Case OMN-13 has been evaluated and approved by the NRC in Reg Guide 1.192.

The proposed change to Technical Specification SR 4.0.5.a is also administrative in nature. The proposed changes comply with approved codes and standards. As a result, there will be no affect on plant safety.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The changes to Technical Specification SR 4.0.5.a and Bases section 4.0.5 and are being proposed to reference the ASME OM Code in addition to Section XI of the ASME Boiler and Pressure Vessel Code. The proposed changes are administrative in nature and do not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, or configuration of the facility.

The use of the ASME OM Code 1995 Edition with 1996 Addenda, Subsection ISTD, with incorporation of the snubber visual examination frequency of Code Case OMN-13 will result in an improvement in personnel safety and dose reduction.

This change will have no operational impact, therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

3. Involve a significant reduction in a margin of safety.

The changes to Technical Specification SR 4.0.5.a and Bases section 4.0.5 do not involve a reduction in the margin of safety. As previously identified, the subject changes are administrative in nature and will add a reference to the ASME OM Code in Technical Specification SR 4.0.5.a. Therefore, the proposed changes to the Technical Specifications and Bases will not result in a reduction in the margin of safety.

Based on the above, HNP concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

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PROPOSED TECHNICAL SPECIFICATIONS CHANGE

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

DELETE

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code* and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

* AND/OR THE ASME CODE FOR OPERATION AND MAINTENANCE OF NUCLEAR POWER PLANTS (OM CODE)

INSERT

DELETE

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REVISED TECHNICAL SPECIFICATIONS PAGE

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and/or the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

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PROPOSED TECHNICAL SPECIFICATIONS BASES CHANGE
(FOR INFORMATION)

APPLICABILITY

BASES

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code*and Addenda as required by 10 CFR 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout these Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an OPERATIONAL MODE or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to 1 week after return to normal operation. And for example, the Technical Specification definition of OPERABLE does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

* AND/OR THE ASME CODE FOR OPERATION AND MAINTENANCE OF NUCLEAR POWER PLANTS (OM CODE)

INSERT

DELETE