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 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Application for amend to License NPF-63, revising Tech Spec Section 6.0, "Administrative Controls," reflecting changes in organizational structure. Detailed description of proposed changes & basis for changes encl.

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Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

SERIAL: NLS-90-199  
10CFR50.90

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G. E. VAUGHN  
Vice President  
Nuclear Services Department

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

SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
REQUEST FOR LICENSE AMENDMENT-NUCLEAR ASSESSMENT DEPARTMENT  
ORGANIZATIONAL CHANGES

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications for the Shearon Harris Nuclear Power Plant (SHNPP). The proposed change revises Section 6.0, "Administrative Controls," of the Technical Specifications to reflect changes in the organizational structure of CP&L.

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

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In addition to the NAD changes, the proposed change deletes the position of Assistant Plant General Manager from the list of members of the Plant Nuclear Safety Committee (PNSC) as this position no longer exists at the Shearon Harris Nuclear Power Plant (SHNPP), and deletes the Technical Specification requirement that CNSS personnel shall evaluate all CP&L LERs for potential applicability to other CP&L nuclear plants. Deletion of this LER review function from the Administrative Controls section of the SHNPP Technical Specifications will not result in a reduction of effort on the part of CP&L regarding LER review. This activity, which is part of the Operational Experience Feedback (OEF) function, is being transferred to the on-site Regulatory Compliance Unit and the Corporate Nuclear Licensing Section in the General Office, as a shared responsibility. The on-site Regulatory Compliance Unit will provide plant-specific LER review to identify issues which have potential applicability to other CP&L nuclear plants. The Nuclear Licensing Section will perform an oversight function as part of its natural generic regulatory responsibility to help assure consistent feedback to and consideration of individual plant issues at the other CP&L nuclear plants.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 details the basis for the Company's determination that the proposed changes require no environmental assessment.

Enclosure 4 provides the proposed Technical Specification pages for SHNPP.

In order to allow time for procedure revision and orderly incorporation into copies of the Technical Specifications, CP&L requests that the proposed amendments, once approved by the NRC, be issued such that implementation will occur within 60 days from the issuance of the amendment.



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NLS-90-199 / Page 3

Please refer any questions regarding this submittal to Mr. R. W. Prunty at  
(919) 546-7318.

Yours very truly,

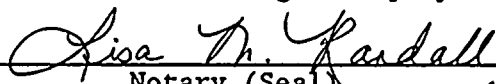


G. E. Vaughn

JCP/mew (826HNP)

Enclosures:

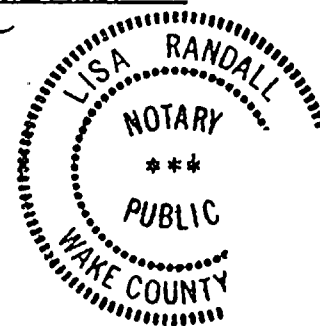
G. E. Vaughn, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

  
\_\_\_\_\_  
Notary (Seal)

My commission expires: 6-7-93

1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Environmental Consideration
4. Technical Specification Pages

cc: Mr. R. A. Becker  
Mr. S. D. Ebnetter  
Mr. J. E. Tedrow



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ENCLOSURE 1

SHEARON HARRIS NUCLEAR POWER PLANT  
NRC DOCKET NO. 50-400/OPERATING LICENSE NO. NPF-63  
REQUEST FOR LICENSE AMENDMENT  
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

BASIS FOR CHANGE REQUEST

Proposed Changes:

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

In addition, the proposed change deletes the position of Assistant Plant General Manager from the list of members of the Plant Nuclear Safety Committee (PNSC) as this position no longer exists at the Shearon Harris Nuclear Power Plant (SHNPP). This change also revises this list to reflect the current position titles for the following PNSC members: (1) the title, Director-Plant Programs and Procedures has been changed to Manager-Plant Programs and Procedures, (2) the title, Director-Regulatory Compliance has been changed to Manager-Regulatory Compliance and (3) the title, Director-QA/QC-Harris Plant has been changed to Manager-QA/QC-Harris Plant. The proposed change also deletes the Technical Specification requirement that CNSS personnel evaluate all CP&L LERs for potential applicability to other CP&L nuclear plants.

The proposed change modifies the following specific sections of the Technical Specifications as indicated:

Section 6.2: Organization

6.2.3 Onsite Nuclear Safety Unit: The proposed change reassigns the Function, Composition, and Responsibility requirements of the Onsite Nuclear Safety (ONS) Unit to the Project Assessment (PA) Section in the



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new Nuclear Assessment Department. The proposed change revises this section to charge the PA Section rather than ONS to make detailed recommendations for revised procedures, equipment modifications, maintenance activities, or other means of improving unit safety to appropriate levels of management. Consistent with the reassignment of responsibilities and PA's new reporting chain, the "appropriate level of management" to receive the ONS/PA recommendations, i. e. "up to and including the Senior Vice President - Operations Support" has been replaced with "up to and including the Executive Vice President - Power Supply." The proposed change also revises the Records section of this Specification to require submittal of records of activities performed by the PA Section to the Manager - Nuclear Assessment Department instead of to the Manager - Nuclear Safety and Environmental Services.

#### Section 6.5: Review and Audit

6.5.1.4 Safety Evaluations and Approvals: The proposed change reassigns from the CNSS to the NAD, review responsibilities for safety evaluations and approvals defined in this section.

6.5.2.2 Composition - Plant Nuclear Safety Committee: The proposed change deletes the position of Assistant Plant General Manager from the list of members of the Plant Nuclear Safety Committee (PNSC) provided in this section. This change also revises this list to reflect the current position titles for the following PNSC members: the title, Director-Plant Programs and Procedures has been changed to Manager-Plant Programs and Procedures, (2) the title, Director-Regulatory Compliance has been changed to Manager-Regulatory Compliance and (3) the title, Director-QA/QC-Harris Plant has been changed to Manager-QA/QC-Harris Plant,

6.5.2.6 Responsibilities - PNSC: The proposed change revises this section of the Technical Specifications to require submittal of PNSC reports covering evaluation and recommendations to prevent recurrence of violations of Technical Specifications to the Manager - Nuclear Assessment Department instead of the Manager - Corporate Nuclear Safety Section. Similarly, the proposed change revises this section to require forwarding of PNSC reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence of any accidental, unplanned, or uncontrolled radioactive release to the Manager - Nuclear Assessment Department rather than the Manager - Nuclear Safety and Environmental Services. The proposed change also revises this section to allow the Manager - Nuclear Assessment Department rather than the Manager Corporate Nuclear Safety Section to request the PNSC to perform special reviews, investigations or analyses and reports thereon.

6.5.2.7 Responsibilities - PNSC: The proposed change revises this section of the Technical Specifications to require the PNSC to provide written notification within 24 hours of disagreement between the PNSC and the Plant General Manager to the Manager - Nuclear Assessment

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Department rather than the Manager-Nuclear Safety and Environmental Services.

6.5.2.8 Records - PNSC: The proposed change revises this section of the Technical Specifications to require submittal of written PNSC meeting minutes to the Manager - Nuclear Assessment Department rather than the Manager - Nuclear Safety and Environmental Services.

6.5.3 Corporate Nuclear Safety Section: The proposed change reassigns to the NAD instead of the CNSS, responsibility for administering the independent review program described in this section. The proposed change also revises this section to define the qualifications for the position of Manager - Nuclear Assessment Department rather than the Manager - Corporate Nuclear Safety Section. The proposed change revises this section to address preparation, distribution and summation of NAD reviews, recommendations, and concerns rather than those of the CNSS as currently addressed in the Technical Specifications.

This section is also revised to delete the Technical Specification requirement that CNSS, now PA/NAD, personnel evaluate all CP&L LERs for potential applicability to other CP&L nuclear plants. Deletion of this requirement from the Technical Specifications, revises them to reflect the requirements of Westinghouse Standard Technical Specifications regarding the function of the independent safety engineering group. This activity, which is part of the Operational Experience Feedback (OEF) function, is not being changed or deleted, but instead is being transferred to other appropriate licensee organizations. This will bring the SHNPP Technical Specifications into alignment with Westinghouse Standard Technical Specification wording. None of the organizations to which this OEF function is being transferred perform functions which necessitate description in the Administrative Controls Section of the Technical Specifications.

6.5.4 Corporate Quality Assurance Audit Program: The proposed change reassigns to the NAD the responsibility for audit of unit activities currently assigned to the Quality Assurance Services Section of the Corporate Quality Assurance Department. Responsibilities currently defined in this section for the Manager - Corporate Nuclear Safety and for the Manager - Quality Assurance Services have been reassigned by this proposed change to the Manager - Nuclear Assessment Department. The proposed change also revises this section to designate the Executive Vice President - Power Supply rather than the Senior Executive Vice President - Power Supply and Engineering and Construction as recipient of audit reports encompassed by Specification 6.5.4.1. The proposed change also deletes the Manager - Nuclear Safety and Environmental Services from this Specification as recipient of the QA audit reports since the ONS function has been transferred to NAD.

6.5.5 Outside Agency Inspection and Audit Program: The proposed change revises this section of the Technical Specifications to specify that the Manager - Nuclear Assessment Department, rather than the Manager -

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Corporate Quality Assurance Department, be a recipient of copies of audit reports concerning independent fire protection and loss prevention inspections and responses to such reports.

#### Section 6.7: Safety Limit Violation

The proposed change revises this section of the Technical Specifications to reassign responsibility for those actions to be taken in the event of violation of a Safety Limit from the Manager - Corporate Nuclear Safety Section to the Manager - Nuclear Assessment Department.

#### Section 6.10.3: Record Retention

The proposed change revises this section of the Technical Specifications to require that records of independent reviews performed by the NAD be retained for the duration of the unit Operating License.

#### Basis

Creation of the NAD requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the CNSS; and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

The independent review function currently provided by the CNSS as outlined in the Technical Specifications, will not be altered by the change. Rather the proposed change will merely reflect a reporting realignment of the individuals and organizations currently providing the independent review function.

Similarly, the audit of unit activity function currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department will not be altered by the change, but will reflect a reporting realignment of the individuals and organizations currently providing the audit function. Reassignment of the audit of unit activity function to the NAD rather than the Corporate Quality Assurance Department will not impact the effectiveness of the Company's quality assurance program. The ultimate responsibility, authority, and independence to assure the effectiveness of the Company's quality assurance program will continue to reside with the Executive Vice President, Power Supply Group after implementation of the reporting realignment of the auditing function proposed by this technical specification change.

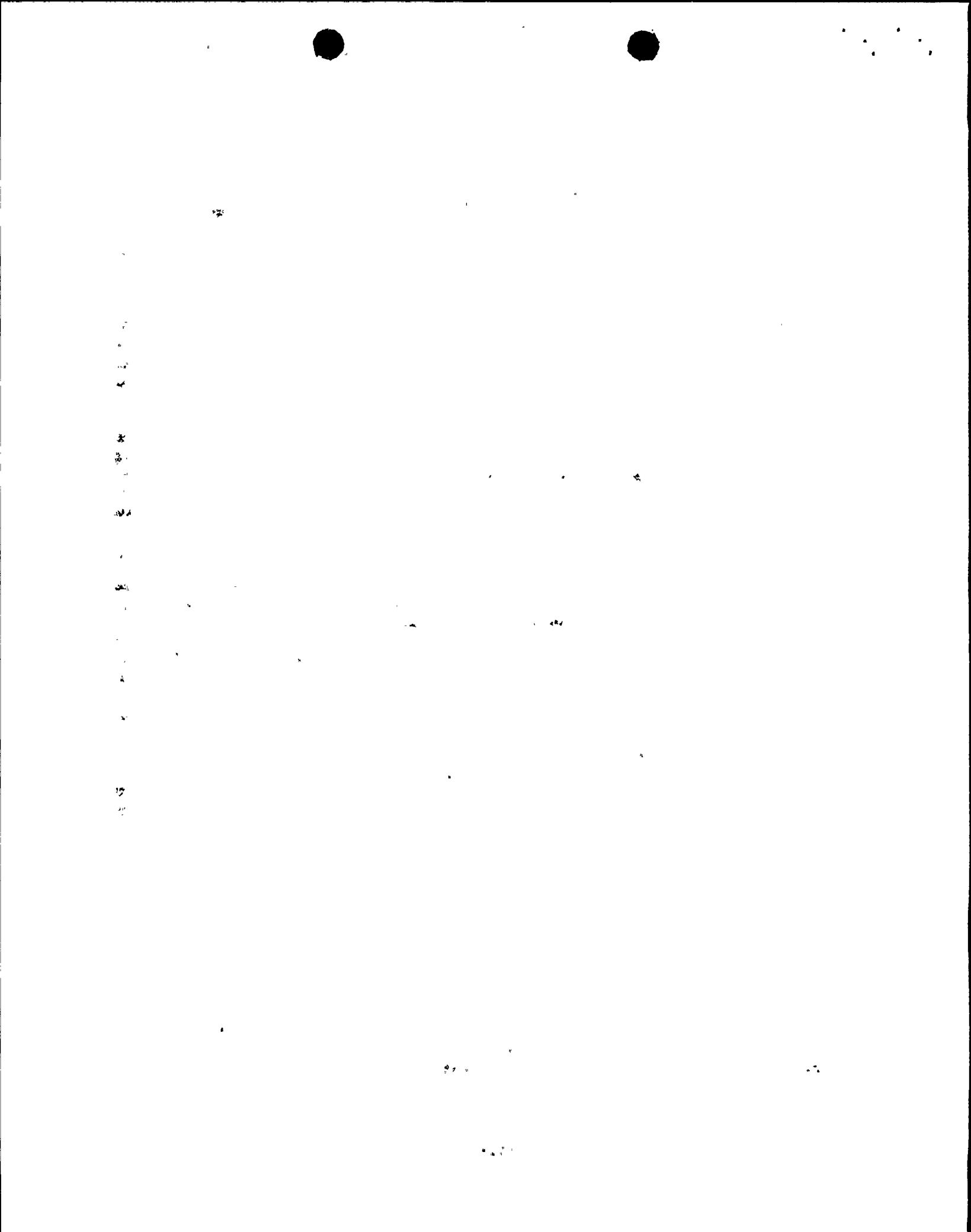
A change unrelated to the NAD organization is the elimination of the Assistant Plant General Manager from the list of members of the PNSC. This position provided no additional area of expertise not already covered by other PNSC

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members and can be eliminated without impact on the decision making capability of the PNSC and without any impact on safe operation of the plant. The other title changes which have been made within Section 6.5.2.2 relating to composition of the PNSC, have been made solely for the purpose of updating these position titles to reflect current position titles. These title changes have no impact on the capability of the PNSC to perform its function and have no impact on the safe operation of the plant.

The Technical Specification requirement for CNSS personnel to evaluate all CP&L LERs for potential applicability to other CP&L nuclear plants is also deleted by the proposed change. This activity, which is part of the Operational Experience Feedback (OEF) function, is being transferred to the on-site Regulatory Compliance Unit and the Corporate Nuclear Licensing Section in the General Office as a shared responsibility. The on-site Regulatory Compliance Unit will provide plant-specific LER review to identify issues which have potential applicability to other CP&L nuclear plants. The Nuclear Licensing Section will perform an oversight function as part of its natural generic regulatory responsibility to help assure consistent feedback to and consideration of individual plant issues at the other CP&L nuclear plants. Neither of these organizations perform functions which necessitate description in the Administrative Controls section of the Technical Specifications. Deletion of this statement from the Technical Specifications will not result in a reduction in effort regarding LER reviews. CP&L is committed to providing effective operating experience feedback. (REF: SHNPP Final Safety Analysis Report description, TMI Appendix, Section I.C.5) The transfer of this OEF activity from CNSS (now NAD) to organizations not described in the Technical Specifications, in no way reduces the effectiveness of CP&L's operational feedback experience program. In fact, NUREG-0737 Section I.C.5 specifies that Technical Specifications are not required to implement this OEF activity.





ENCLOSURE 2

SHEARON HARRIS NUCLEAR POWER PLANT  
NRC DOCKET NO. 50-400/OPERATING LICENSE NO. NPF-63  
REQUEST FOR LICENSE AMENDMENT  
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility 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, (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. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

Proposed Change

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

In addition, the proposed change deletes the position of Assistant Plant General Manager from the list of members of the Plant Nuclear Safety Committee (PNSC) as this position no longer exists at the Shearon Harris Nuclear Power Plant (SHNPP). This change also revises this list to reflect the current position titles for the following PNSC members: the title, Director-Plant Programs and Procedures has been changed to Manager-Plant Programs and Procedures, (2) the title, Director-Regulatory Compliance has been changed to Manager-Regulatory Compliance and (3) the title, Director-QA/QC-Harris Plant

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has been changed to Manager-QA/QC-Harris Plant. This change also deletes the Technical Specification requirement that CNSS personnel evaluate all CP&L LERS for potential applicability to other CP&L nuclear plants.

Basis

The change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because it is administrative in nature and does not physically alter any safety-related systems nor does it affect the way in which any safety-related systems perform their functions.

Section 6.0 of the Technical Specifications was revised to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. The proposed change is administrative in nature in that the changes reflect organizational reporting changes rather than changes in the nature or depth of reviews and audits; recommendations for procedures, modifications, maintenance and operations activities; or other means of affecting unit safety. The independent review function currently provided by the CNSS as outlined in the Specifications, will not be altered by the change; rather the proposed change will merely reflect a reporting realignment of the individuals and organizations currently providing the independent review function. Similarly, the audit of unit activity function currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department will not be altered by the change; but will reflect a reporting realignment of the individuals and organizations currently providing the audit function. The other revisions to titles and organizations in the proposed change solely revise the Technical Specifications to reflect the current organizational structure of the Company.

The position of Assistant Plant General Manager has been eliminated at SHNPP. As such the proposed change deletes the Assistant Plant General Manager from the list of PNSC members provided in Technical Specification 6.5.2.2. This position provided no additional area of expertise not already covered by other PNSC members and can be eliminated without impact on the decision making capability of the PNSC and without any impact on safe operation of the plant. The meeting frequency, quorum requirements, and responsibilities of the PNSC are not affected by this proposed change to composition of the PNSC. The other title changes which have been made within Section 6.5.2.2 relating to composition of the PNSC, have been made solely for the purpose of updating these position titles to reflect current position titles. These title changes have no impact on the capability of the PNSC to perform its function and have no impact on the safe operation of the plant.



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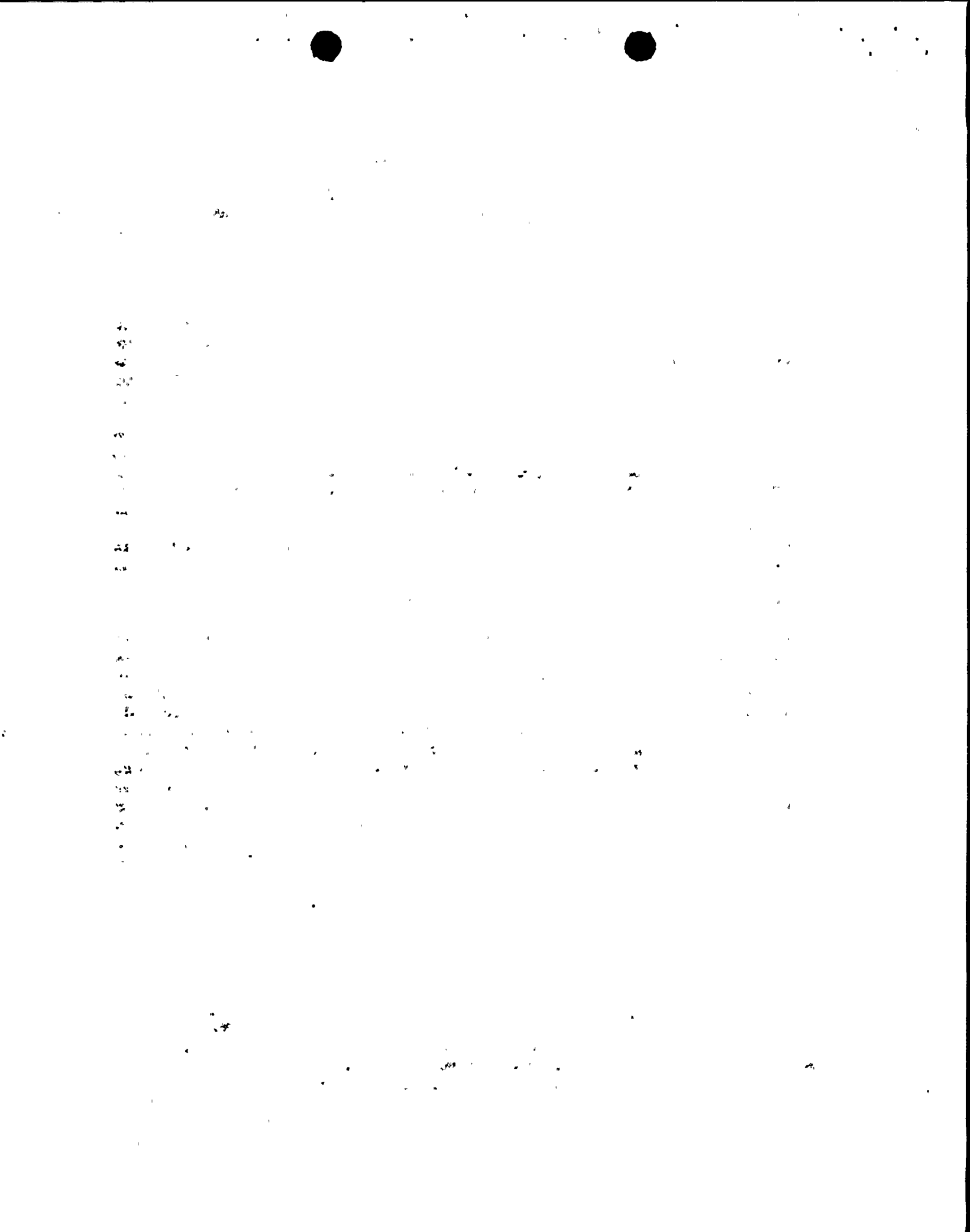
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Deletion of the Technical Specification requirement that CNSS (now NAD) personnel evaluate all CP&L LERs for potential applicability to other CP&L plants will not result in the elimination of the LER review activity. This activity, which is part of the Operational Experience Feedback (OEF) function, is being transferred to the on-site Regulatory Compliance Unit and the Corporate Nuclear Licensing Section in the General Office as a shared responsibility. The on-site Regulatory Compliance Unit will provide plant-specific LER review to identify issues which have potential applicability to other CP&L nuclear plants. The Nuclear Licensing Section will perform an oversight function as part of its natural generic regulatory responsibility to help assure consistent feedback to and consideration of individual plant issues at the other CP&L nuclear plants.

Deletion of the Technical Specification requirement from this section will not impact safe operation of the plant since this change is administrative in nature and does not alter the review or feedback activities. In fact, NUREG-0737 Section I.C.5 specifies that Technical Specifications are not required to implement this OEF activity.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. As stated in Item 1, the proposed change is administrative in nature and does not physically alter any safety related systems, nor does it affect the way in which any safety related systems perform their functions. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not involve a significant reduction in the margin of safety. The proposed change is administrative in nature and does not physically alter any safety related systems nor does it affect the way in which any safety related systems perform their functions. As a result of the change, the Shearon Harris Technical Specifications will better reflect the actual management structure at both the Shearon Harris Nuclear Power Plant and the Corporate Office. Therefore, the proposed amendment does not involve a significant reduction in margin of safety.



ENCLOSURE 3

SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
REQUEST FOR LICENSE AMENDMENT  
NUCLEAR ASSESSMENT DEPARTMENT ORGANIZATION CHANGES

ENVIRONMENTAL CONSIDERATION

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (3) result in an increase in an individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. This basis for this determination follows:

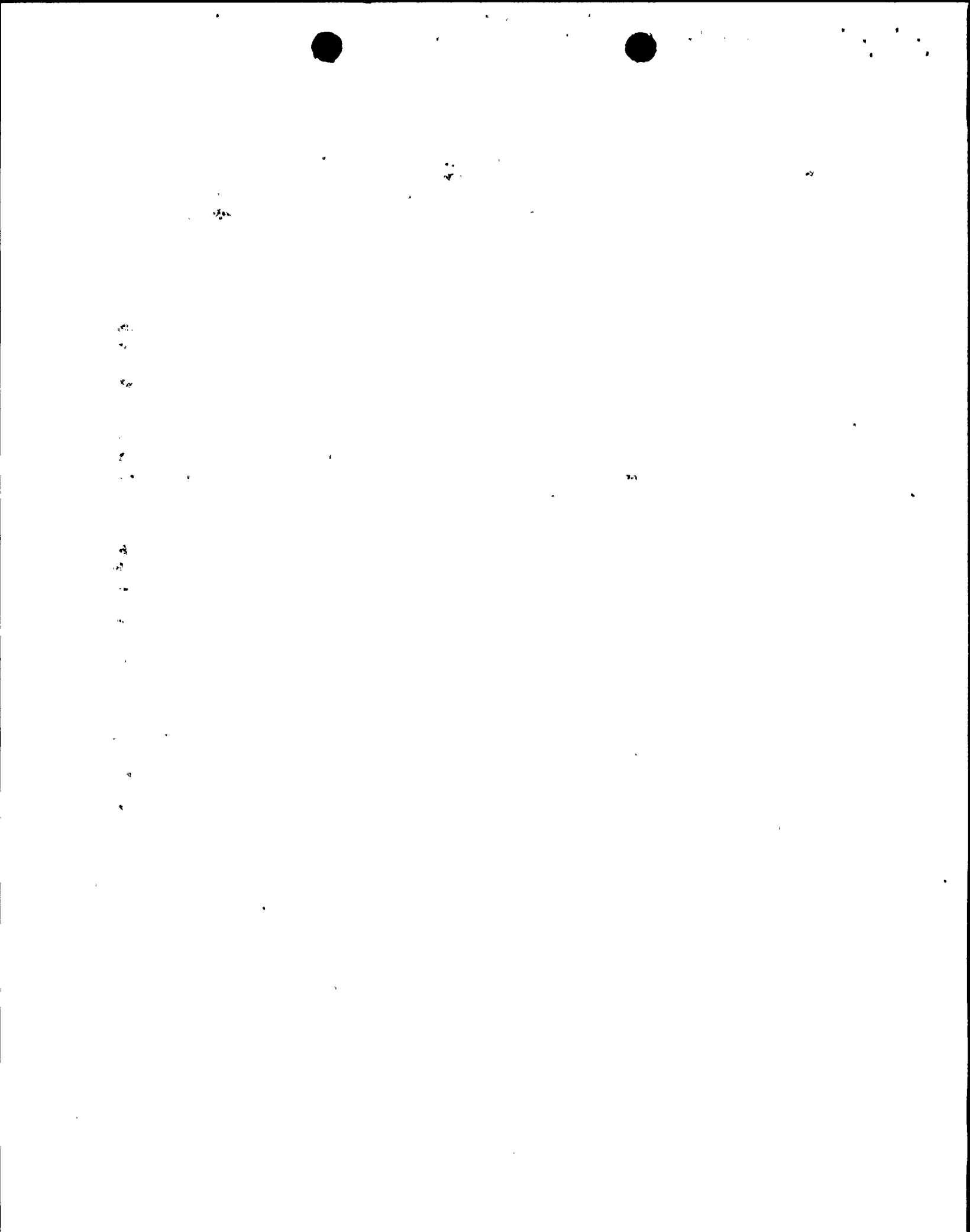
Proposed Change

Carolina Power & Light Company (CP&L) has created a Nuclear Assessment Department (NAD) which will perform internal evaluation and assessment activities and will serve as senior management's staff for the objective oversight of Nuclear Generation Group performance relating to nuclear safety, reliability, and quality. The department's fundamental role is to assist senior management in the early identification of those barriers which may prevent the Company's nuclear projects from achieving the desired level of performance on a sustained basis and in ensuring their effective correction. The NAD will assume the functions and responsibilities for (1) administering the Company's independent review program for nuclear facilities which is currently provided by the Corporate Nuclear Safety Section (CNSS); and (2) the audit of unit activity currently provided by the Quality Assurance Services Section of the Corporate Quality Assurance Department.

Creation of the Nuclear Assessment Department requires that the Technical Specifications be modified to reflect changes in the organizational structure of CP&L. Accordingly, titles of positions and organizations referenced in the Technical Specifications must be changed to reflect this organizational change.

In addition, the proposed change deletes the position of Assistant Plant General Manager from the list of members of the Plant Nuclear Safety Committee (PNSC) as this position no longer exists at the Shearon Harris Nuclear Power Plant (SHNPP). This change also revises this list to reflect the current position titles for the following PNSC members: the title, Director-Plant





Programs and Procedures has been changed to Manager-Plant Programs and Procedures, (2) the title, Director-Regulatory Compliance has been changed to Manager-Regulatory Compliance and (3) the title, Director-QA/QC-Harris Plant has been changed to Manager-QA/QC-Harris Plant. The proposed change also deletes the Technical Specification requirement that CNSS personnel evaluate all CP&L LERs for potential applicability to other CP&L nuclear plants.

Basis

This change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. The proposed amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. As such, the change cannot affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change is purely administrative in nature and only revises Section 6 "Administrative Controls" of the Technical Specifications to reflect changes in the organizational reporting structure of CP&L due to the creation of the NAD. No additional surveillances or testing results from the amendment. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.