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VAUGHN,G.E. Carolina Power & Light Co.
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Document Control Branch (Document Control Desk)

SUBJECT: TS change request to revise Instrumentation Specifications 3.3.2,3.3.3.1 & 3.3.3.6 to include editorial corrections,w/ clarified rewording & simplification of requirement presentation.TS 3.3.3.1 also revised to conform w/TS 3.9.12.

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P.O. Box 1551 • Raleigh, N.C. 27602

APR 02 1992

G. E. VAUGHN
Vice President
Nuclear Services Department

SERIAL: NLS-92-090
10 CFR 50.90

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
INSTRUMENTATION

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 (TS) for the Shearon Harris Nuclear Power Plant (SHNPP).

This Technical Specification Change Request proposes to revise Instrumentation Specifications 3.3.2, 3.3.3.1 and 3.3.3.6 to include editorial corrections, clarifying rewording and/or simplification of the presentation of the requirements. The Action Requirements of Specification 3.3.3.1 would also be revised to be consistent with associated Technical Specification 3.9.12. The changes are primarily administrative in nature and do not affect the purpose, intent or effectiveness of the requirements of each Specification.

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

Enclosure 2 details, in accordance with 10 CFR 50.91(a), the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides page change instructions for incorporating the proposed revisions.

Enclosure 5 provides the proposed Technical Specification pages.

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

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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 of issuance of the amendment.

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

Yours very truly,

G. E. Vaughn

SDC/sdc

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Technical Specification Pages

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.

Eleanor C. Chappell

Notary (Seal)

ELEANOR C. CHAPPELL NOTARY PUBLIC WAKE COUNTY, N.C.

My commission expires: 2/6/96

cc: Mr. Dayne H. Brown
Mr. S. D. Ebneter
Ms. B. L. Mozafari
Mr. J. E. Tedrow

ENCLOSURE 1

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
INSTRUMENTATION

BASIS FOR CHANGE REQUEST

Proposed Change

This Technical Specification Change Request proposes to revise Instrumentation Specifications 3.3.2, 3.3.3.1 and 3.3.3.6 to include editorial corrections, clarifying rewording and/or simplification of the presentation of the requirements. The Action Requirements of Specification 3.3.3.1 would also be revised to be consistent with associated Technical Specification 3.9.12. The changes are primarily administrative in nature and do not affect the purpose, intent or effectiveness of the requirements of each Specification.

Basis

The proposed changes to Technical Specifications 3.3.2, Engineered Safety Features Actuation System Instrumentation; Specification 3.3.3.1, Radiation Monitoring for Plant Operations; and Specification 3.3.3.6, Accident Monitoring Instrumentation are described below.

TS 3.3.2: Engineered Safety Features Actuation System Instrumentation

Table 3.3-3 in Technical Specification 3.3.2 lists the instrumentation and interlocks that are required to be operable for the Engineered Safety Features Actuation System. The table is arranged in an outline fashion with each line item representing a set or subset of instruments. The proposed amendment revises the outline notation for Table Item 3.c.4.c from "c)" to "c." to be consistent with the remainder of the notation convention in the table.
(Reference Page 3/4 3-21 in Enclosure 5)

TS 3.3.3.1: Radiation Monitoring for Plant Operations

This Technical Specification provides minimum operability requirements for radiation monitoring instrumentation channels and their Alarm/Trip setpoints from which automatic isolation or response actions are derived. The Specification lists, in Table 3.3-6, the required radiation monitors, the number of required channels, channels to trip, applicability, alarm/trip setpoints and monitor-specific LCO Action Requirements.

The three proposed changes to this specification affect only the referenced Table 3.3-6, Radiation Monitoring Instrumentation for Plant Operation.

a) Table 3.3-6, Items 2a and 2b are the North and South area radiation monitor networks of the Fuel Handling Building -- Spent Fuel Pool Area. This change provides clarification that both safety trains must have an operable channel; it does not alter the number of channels required

operable. The monitor network's high radiation alarm actuates automatic switchover from the normal to the emergency ventilation and filtration system. The Table lists the number of Channels to Trip and Minimum Channels Operable required for the North and South networks whenever irradiated fuel is in the North or South pools. The proposed revision would amend the Item 2a and 2b Channels to Trip and Minimum Channels Operable column entries to reflect the number of channels required operable per safety train.
(Reference Page 3/4 3-51 in Enclosure 5)

b) This proposed amendment would revise Action Statement 28 in Table 3.3-6 for the Fuel Pool operating floor area radiation monitors such that it is consistent with but not more restrictive than the FHB Emergency Exhaust System Technical Specification Action Statements. Specifically, if a required train of radiation monitors is inoperable then the associated train of the FHB Emergency Exhaust System (EES) is declared inoperable and the Action Statements of Technical Specification 3.9.12 for the FHB EES apply.

Table 3.3-6, Items 2a and 2b are the North and South area radiation monitor networks of the Fuel Handling Building -- Spent Fuel Pool Area. The monitor network's high radiation alarm actuates automatic switchover from the normal to the Fuel Handling Building Emergency Exhaust System. The FHB EES is governed by Technical Specification 3.9.12. Table 3.3-6 lists the minimum number of channels required operable required for the North and South general area radiation monitor networks whenever irradiated fuel is in the North or South pools. The Table also provides reference to applicable Action Statements. Two channels are required operable in the north network as well as two channels in the south monitoring network whenever spent fuel is in either area. Action Statement 28 requires that with less than the Minimum Channels operable, all operations involving movement of fuel within the storage pool or crane operations over the storage pool are to be suspended.

The Specification 3.3.3.1 Bases states that the operability of the radiation monitoring instrumentation for plant operations ensures that the associated action will be initiated when the radiation level monitored by each channel or combination thereof reaches its setpoint. In this case, the "associated action" for the two radiation monitoring instrumentation channels is the automatic initiation of the two (100% capacity) safety trains of the FHB Emergency Exhaust System of Technical Specification 3.9.12.

Technical Specification 3.9.12, Fuel Handling Building Emergency Exhaust System, requires two independent EES trains to be operable. Action Statement "a" requires that with only one of two required EES trains operable, fuel movement within the storage pool or crane operation with loads over the storage pool may proceed provided the Operable FHB EES 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. The Action Statement also requires that with both trains inoperable, all operations will be suspended until one train is restored to operable status.
(Reference Page 3/4 3-53 in Enclosure 5)

c) Table 3.3-6, Action Statement 30, would be revised to capitalize "Minimum Channel" such that it is consistent with the other Action Statements for this Table.
(Reference Page 3/4 3-53 in Enclosure 5)

TS 3.3.3.6: Accident Monitoring Instrumentation

This Technical Specification provides minimum operability requirements for accident monitoring instrumentation such that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. The Specification lists, in Table 3.3-10, the required monitoring instrumentation, the Total Required Number of Channels and the Minimum Channels Operable for each parameter monitored.

The five proposed changes to this specification affect Action Statements a. through c., and Tables 3.3-10 and 4.3-7. This proposed amendment would revise Technical Specification 3.3.3.6, Accident Monitoring Instrumentation, and its associated Table 3.3-10 to:

a) Remove the ambiguity between the defined scope of Action Statement a. (with its stated exceptions) and the Total Required Number of Channels in Table 3.3-10 Items 11 and 14.

Action Statement a. states, "With the number of OPERABLE accident monitoring instrumentation channels less than the Total Required Number of Channels shown in Table 3.3-10, except for the pressurizer safety valve position indicator or the sub-cooling margin monitor, restore the inoperable channel(s) to Operable status within 7 days,...". Table 3.3-10 lists the Total Required Number of Channels as two and the Minimum Channels Operable as one for both Items 11 (sub-cooling margin monitor) and 14 (Pressurizer safety valve position indicator). This proposed amendment would eliminate this ambiguity by deleting the exceptions in Action Statement a. and inserting "N.A." in the Total Required Number of Channels column of Table 3.3-10. The net effect would be to remove any potential for confusion as to the Total Required Number of Channels, and at the same time leave the Minimum Channels Required unchanged.
(Reference Pages 3/4 3-66 and 3/4 3-68 in Enclosure 5)

b) Remove the ";or" at the end of Action Statement a. and b. such that these action statements are consistent with the standard Action Statement presentation format in the rest of the Technical Specifications.
(Reference Page 3/4 3-66 in Enclosure 5)

c) Revise Action Statement c. to reword the reference to Table 3.3-10, delete an unnecessary comma, and place parentheses around the "s" of "channels" such that Action Statement c. has a format consistent with Action Statements a. and b.
(Reference Page 3/4 3-66 in Enclosure 5)

d) Delete repetitive and potentially misleading identical listings in Table 3.3-10 where the Total Required Number of Channels and the Minimum Channels Required are identical.

This applies only to Table 3.3-10, Items 7, 8, 10, 12 and 13 which lists one channel per steam generator or per valve (as appropriate) for both the

Total Required Number of Channels and the Minimum Channels Operable. Although the Table itself presents the information clearly, there is the possibility for misreading the Technical Specification requirements if less than the required number of channels are operable, since two Action Statements would be entered.

Limiting Condition of Operation (LCO) Action a., with a seven day time limit, would apply if the number of operable instruments falls below the Total Required Number of Channels. However, Action b., with a 48 hour limit clock, would also apply, since the number of operable instruments would also fall below the Minimum Channels Operable.

Since the number of required instruments for "Total" and "Minimum" are the same in Table 3.3-10 Items 7, 8, 10, 12 and 13, and given that Action Statement b. will always be limiting, this amendment proposes to delete reference to the less restrictive of the two requirements to ensure that the Technical Specification cannot be misread in a non-conservative manner.
(Reference Page 3/4 3-68 in Enclosure 5)

e) Revise the instrument descriptions for Items 18, 23 and 24 in Table 3.3-10 and Surveillance Requirements Table 4.3-7 such that they are consistent with other references to these instruments elsewhere in these Technical Specifications as well as with standard plant nomenclature.
(Reference Pages 3/4 3-69 and 3/4 3-70 in Enclosure 5)

ENCLOSURE 2

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
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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 determination. The bases for this determination are as follows:

Proposed Change

This Technical Specification Change Request proposes to revise Instrumentation Specifications 3.3.2, 3.3.3.1 and 3.3.3.6 to include editorial corrections, clarifying rewording and/or simplification of the presentation of the requirements. The Action Requirements of Specification 3.3.3.1 would also be revised to be consistent with associated Technical Specification 3.9.12. The changes are primarily administrative in nature and do not affect the purpose, intent or effectiveness of the requirements of each Specification.

Basis

This 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.

   With the exception of the changes to Action Statement 28 to Specification 3.3.3.1, the proposed changes affect only the format of the information and/or requirements presented in the designated Technical Specifications and therefore have no impact on the probability or consequences of an accident previously evaluated. No safety-related equipment, safety function or plant operation will be altered as a result of these proposed changes. The revisions do not change the function, materials, or construction standards applicable to the AFW pumps.

   The Revision to Action Statement 28 does, by itself, effectively relax the restrictions on spent fuel handling activities if two radiation monitoring channels are not available. However, this has no impact on any accident initiating factors, and therefore, does not significantly increase the probability of an accident previously evaluated. Additionally, it does not significantly increase the consequences of an accident previously

evaluated because, when viewed in conjunction with its reference to the Action Requirements of Specification 3.9.12, it is bounded by the Technical Specification 3.9.12 limitations governing operation of the Fuel Handling Building Emergency Exhaust System. The Radiation monitoring System's automatic initiation function of starting the Emergency Exhaust System is effectively satisfied by including direct reference to the Action Statement Requirements of Specification 3.9.12, which require that the operable train of the Emergency Exhaust System be running.

Therefore, there would be no increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

With the exception of the changes to Action Statement 28 to Specification 3.3.3.1, the proposed changes affect only the format of the information and/or requirements presented in the designated Technical Specifications. The revision to Action Statement 28 has no impact on any accident initiating factors.

No safety-related equipment, safety function or plant operations will be altered as a result of this proposed change. The changes do not affect the function, materials, or construction standards applicable to plant systems, nor do the changes reduce the availability of accident mitigation systems.

Therefore, the proposed changes do 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.

Those changes which revise only the format of information presented within the affected Technical Specifications do not impact the margin of safety as defined in the BASES for any of the affected Technical Specifications.

In addition, the revision to Technical Specification 3.3.3.1 Action Statement 28 has no net effect on the margin of safety as defined in the BASES for Specification 3.3.3.1. Although the revised Action Statement would allow operation with only one Fuel Pool operating floor area radiation monitor channel in service, it also requires that the associated operable FHB Emergency Filtration System train be operating. This obviates the need for the Radiation Monitoring Systems to automatically initiate operation of the Emergency Filtration System if a high radiation level alarm were to be generated while only one monitor train was operable.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

ENCLOSURE 3

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
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ENVIRONMENTAL CONSIDERATIONS

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; (3) result in an increase in 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. The basis for this determination follows:

Proposed Change

This Technical Specification Change Request proposes to revise Instrumentation Specifications 3.3.2, 3.3.3.1 and 3.3.3.6 to include editorial corrections, clarifying rewording and/or simplification of the presentation of the requirements. The Action Requirements of Specification 3.3.3.1 would also be revised to be consistent with associated Technical Specification 3.9.12. The changes are primarily administrative in nature and do not affect the purpose, intent or effectiveness of the requirements of each Specification.

Basis

The 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.

   These changes which revise only the format of information presented within the affected Technical Specifications do not impact the types or ammounts of effluents released offsite. Furthermore, the revision to Technical Specification 3.3.3.1 Action Statement 28 would have no effect on the types or ammounts of effluents released offsite, since the Action Statement changes have no effect on the source of radioactive material postulated to be released. Nor would there be significant impact on any release if it were filtered through one 100% capacity Fuel Handling Building Emergency Exhaust System train versus or split between both

trains.

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 changes either provide administrative format changes of the Technical Specifications or may potentially require additional operation of one train of the FHB Emergency Exhaust System. Neither has any impact on the general radiation fields in the vicinity of the FHB fuel pools nor creates any additional surveillance testing through which personnel could receive additional exposure.

Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 4
SHEARON HARRIS NUCLEAR POWER PLANT
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PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
3/4 3-21	3/4 3-21
3/4 3-51	3/4 3-51
3/4 3-53	3/4 3-53
3/4 3-66	3/4 3-66
3/4 3-68	3/4 3-68
3/4 3-69	3/4 3-69
3/4 3-71	3/4 3-71