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SUBJECT: Application for amend to License NPF-63, revising TS 6.4 re  
 initial & requalification training for licensed personnel to  
 allow training program to be based on GL 87-07.

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# CP&L

Carolina Power & Light Company

P.O. Box 1551 • Raleigh, N.C. 27602

MAR 04 1993

R. B. STARKEY, JR.  
Vice President  
Nuclear Services Department

SERIAL: NLS-93-024  
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 - TRAINING

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). The proposed amendment revises Technical Specification 6.4 concerning the initial and requalification training for licensed personnel. Specifically, the proposed change would allow the training program to be based on a systematic approach to training as permitted by 10 CFR 55.31, 10 CFR 55.59, and NRC Generic Letter 87-07.

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 amendment, 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,

  
R. B. Starkey, Jr.


LSR/jbw

Enclosures:

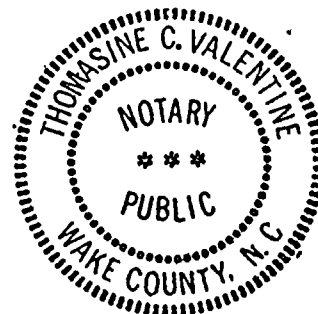
1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Technical Specification Pages

cc: Mr. Dayne H. Brown  
Mr. S. D. Ebnetter  
Mr. N. B. Le  
Mr. J. E. Tedrow

R. B. Starkey, Jr., 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: 1-31-95





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SHEARON HARRIS NUCLEAR POWER PLANT  
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REQUEST FOR LICENSE AMENDMENT  
TRAINING

BASIS FOR CHANGE REQUEST

Background

NRC Generic Letter 87-07, dated March 19, 1987, transmitted information to licensees concerning Final Rulemaking for Revisions to Operator Licensing. The revisions affected both initial license and regualification training for operators and allowed the substitution of an accredited training program in lieu of training programs previously approved by the NRC. Such a substitution could be implemented upon written notification to the NRC and did not require any NRC staff review. The Generic Letter also noted that the training program description described in the FSAR need not be amended until the next update required by 10 CFR 50.71(e).

By letter dated May 24, 1988, CP&L notified the NRC that the initial and regualification training programs for operators, as required by 10 CFR 55.31(a) and 10 CFR 55.59(c), were accredited and based on a systematic approach to training. SHNPP FSAR Section 13.2.1.1.2 was revised accordingly; however, Technical Specification 6.4, which required conformance to the NRC letter of March 28, 1980, was not revised. As a result, CP&L has been satisfying two different guidelines. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," dated November 1, 1987 (Question No. 98, Page 23) states that "[there] are a number of facilities that have a more restrictive requirement in their Technical Specifications than that for which they would have to apply; amending their Technical Specifications to obtain relief is permitted under the rule. It would be an administrative change in order to conform with the regulation."

Proposed Change

The proposed Technical Specification change would allow the initial and regualification training program for licensed personnel to be based on a systematic approach to training as permitted by 10 CFR 55.31, 10 CFR 55.59, and NRC Generic Letter 87-07.

Basis

This revision to the Shearon Harris Nuclear Power Plant (SHNPP) training requirements has no relevance to any Final Safety Analysis Report (FSAR) Chapter 15 accident initiators; therefore, no increase in the probability of such accidents would occur. The proposed administrative change does not involve any modifications to plant equipment and therefore does not affect other equipment that could initiate an accident. Further, no new procedures are being created and no existing procedures are being modified. Therefore, the proposed change does not increase the consequences of an accident previously evaluated, will not increase the probability or consequences of an equipment malfunction previously evaluated in the FSAR, and will not create

the possibility of a new or different kind of accident from an accident previously evaluated. Accordingly, the proposed change would not result in a reduction in the margin of safety as defined in the Technical Specifications.

Conclusions

The proposed change simply revises the Technical Specifications to be consistent with the FSAR, as permitted by NUREG-1262. This change is purely administrative in nature and does not constitute an unreviewed safety question.

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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

The proposed Technical Specification change would allow the initial and regualification training program for licensed personnel to be based on a systematic approach to training as permitted by 10 CFR 55.31, 10 CFR 55.59, and NRC Generic Letter 87-07.

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.

This administrative change to Technical Specification 6.4 has no affect on equipment, procedures, or accident initiators. 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.

Since this is an administrative change, there are no modifications or additions to plant equipment. 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.

The proposed change does not affect any parameters which relate to the margin of safety as defined in the Technical Specifications. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

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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 off-site; (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

The proposed Technical Specification change would allow the initial and requalification training program for licensed personnel to be based on a systematic approach to training as permitted by 10 CFR 55.31, 10 CFR 55.59, and NRC Generic Letter 87-07.

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 off-site.

The proposed amendment does not introduce any new equipment, nor does it require existing systems to perform a different type of function than they are currently designed to perform. As such, the change can not affect the types or amounts of any effluents that may be released off-site.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure.

The proposed change does not result in changes to Technical Specification surveillance requirements and does not affect personnel radiation exposure. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.