

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9604090286 DOC. DATE: 96/04/02 NOTARIZED: NO DOCKET #
FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
AUTH. NAME AUTHOR AFFILIATION
ROBINSON, W.R. Carolina Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Requests prior approval for rev to HNP Emergency Plan, Table 2.2-1.

DISTRIBUTION CODE: A045D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4+3
TITLE: OR Submittal: Emergency Preparedness Plans, Implement'g Procedures, C

NOTES: Application for permit renewal filed. 05000400

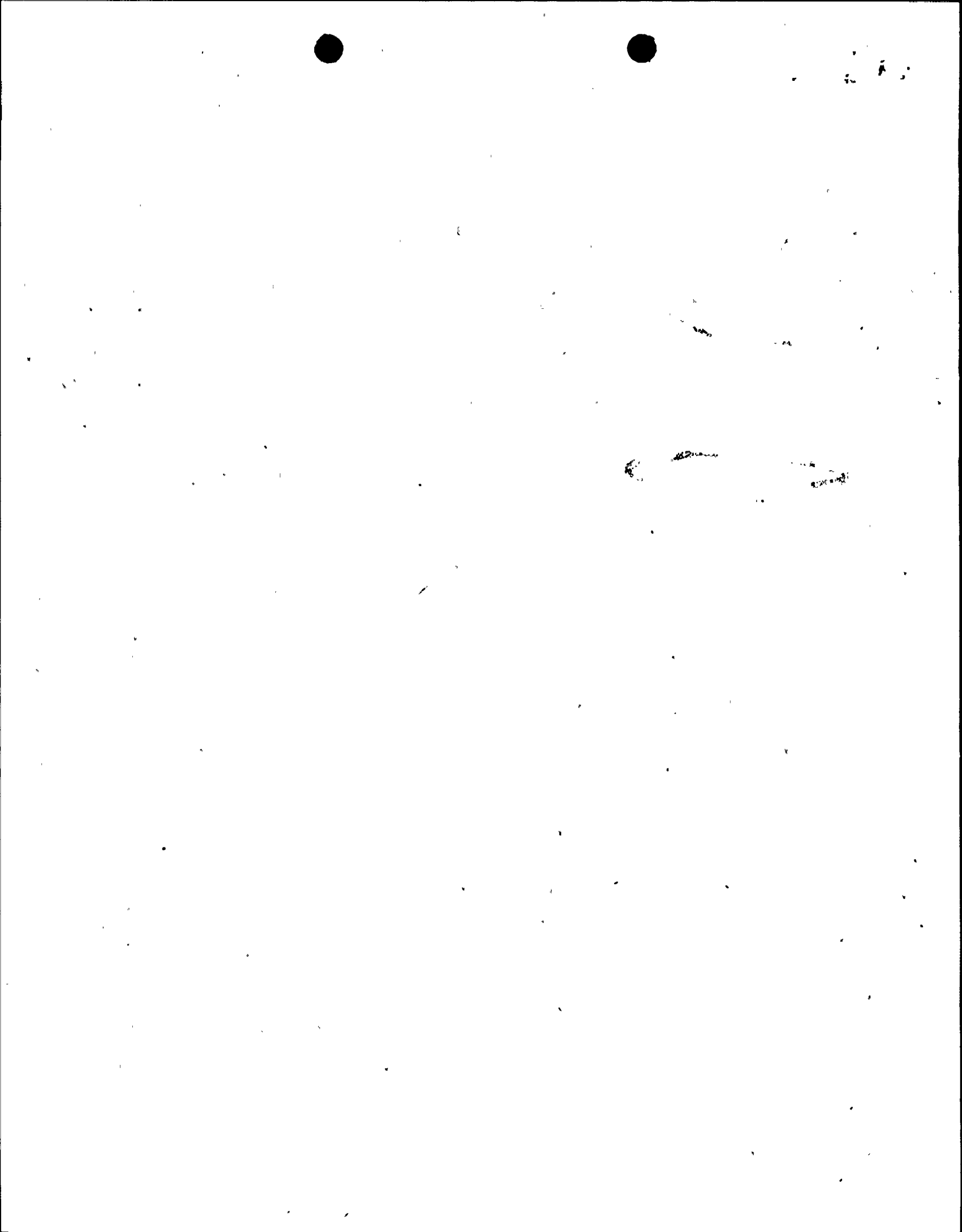
	RECIPIENT		COPIES		RECIPIENT		COPIES	
	ID CODE/NAME		LTR	ENCL	ID CODE/NAME	LTR	ENCL	
	PD2-1 PD		1	1	LE, N	1	1	
INTERNAL:	<u>FILE CENTER 01</u>		2	2	NRR/DRPM/PERB	1	1	
	NUDOCS-ABSTRACT		1	1				
EXTERNAL:	NOAC		1	1	NRC PDR	1	1	

C
A
T
E
R
Y

D
O
C
U
M
E
N
T

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 8 ENCL 8





Carolina Power & Light Company
PO Box 165
New Hill NC 27562

William R. Robinson
Vice President
Harris Nuclear Plant

APR 2 1996

SERIAL: HNP-96-047

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 PRIOR APPROVAL
REVISION TO EMERGENCY PLAN

Gentlemen:

In response to NRC Information Notice 95-48, "Results of Shift Staffing Study," and in conjunction with ongoing plant staffing assessments, Carolina Power & Light Company (CP&L) has conducted an evaluation of on-shift staffing levels at the Harris Nuclear Plant (HNP). As a result of this staffing assessment, opportunities have been identified for revising the HNP on-shift staffing complement. These changes were recently discussed with the NRC Regional staff in Atlanta, Georgia.

Although not required by 10 CFR 50.54(q), CP&L requests that the NRC provide prior approval for the attached proposed revision to the HNP Emergency Plan, Table 2.2-1, which addresses minimum shift staffing in the event of a plant emergency. We are confident that the proposed revision will not degrade the effectiveness of the HNP Emergency Preparedness program and that the program will continue to meet both the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. However, since the proposed revision, which results in a reduction in the staff complement, would be difficult to reverse once implemented, CP&L requests prior NRC approval.

Based upon a discussion between Mr. Ken Barr of the Regional staff and CP&L's Mr. T. D. Walt, we understand that NRC review of the proposed changes will be completed within 30 days of receipt. Questions regarding this matter may be referred to Mr. T. D. Walt at (919) 362-2711.

Sincerely,

LSR/lsr

Enclosures

c: Mr. J. B. Brady
Mr. S. D. Ebnetter
Mr. N. B. Le

9604090286 960402
PDR ADDOCK 05000400
PDR

ADK/5/1



ENCLOSURE 1

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400 / LICENSE NO. NPF-63
REQUEST FOR PRIOR APPROVAL
REVISION TO HNP EMERGENCY PLAN

BASIS FOR REVISION REQUEST

Background

On October 10, 1995, the Commission issued NRC Information Notice 95-48, "Results Of Shift Staffing Study," informing addressees of the results of the NRC's study conducted as part of an NRC Office of Nuclear Regulatory Research (RES) project to address the adequacy of minimum shift staffing levels at nuclear power plants. The Notice stated an expectation that recipients review the information for applicability and consider actions, as appropriate, to avoid similar problems.

In response to Information Notice 95-48, and in conjunction with ongoing plant staffing assessments, an initiative was undertaken at the Harris Nuclear Plant (HNP) to evaluate on-shift staffing levels. The evaluation reviewed the response activities and the sequence and timing of those response activities relative to the number of on-shift staff available to support an adequate response. Representatives from plant Operations, Environmental and Radiation Control (E&RC), Maintenance, and Regulatory Affairs - Emergency Preparedness were involved in the assessment. In addition to the information presented in Information Notice 95-48, an integral part of this assessment was an evaluation of the emergency response staffing requirements established in (1) Table 2.2-1 of the HNP Emergency Plan, and (2) the emergency response functional areas and major tasks outlined in NUREG-0654 \ FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Table B-1.

As a result of the staffing assessment, CP&L has identified opportunities to make revisions to the HNP on-shift staffing complement. While the Company is confident that the proposed revisions will not degrade the effectiveness of the HNP Emergency Preparedness program and that the program will continue to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E, the nature of the changes (which entail a reduction in the staff complement at HNP) would be difficult to reverse once implemented. Therefore, although not required by 10 CFR 50.54(q), CP&L is seeking prior approval for a revision to the HNP Emergency Plan, Table 2.2-1, which addresses minimum shift staffing in the event of a plant emergency.



100

100

100

100

Proposed Change

CP&L proposes a revision to Table 2.2-1 of the HNP Emergency Plan to reduce the on-shift minimum staffing levels from 19 to 16 positions. This revision would affect only the on-shift component of Table 2.2-1 and would not alter the staff augmentation sections of the Table. The new staffing levels would not reduce on-shift staffing below the guidance established in NUREG-0654 FEMA-REP-1, Rev.1, Table B-1.

Specifically, the proposed changes to Table 2.2-1 (Enclosure 2) would:

- Revise row five - *Plant Engineering Repair and Corrective Actions*, column - *Minimum Shift Size*, for the two positions in Mechanical Maintenance and Electrical / I&C Maintenance to include an asterisk (*) permitting those positions to have other assigned functions.
- Revise row six - *Protective Actions*, column - *Minimum Shift Size*, for Radiation Control Personnel to include an asterisk (*) on one of the two positions, permitting this position to have other assigned functions.
- Revise row eight - *Fire Fighting*, column - *Job Category*, to refer to Plant Personnel instead of Operations personnel.
- Revise row eight - *Fire Fighting*, column - *Minimum Shift Size*, to delete the asterisk.
- Revise row - *CP&L TOTAL*, column - *Minimum Shift Size*, to read "16."
- Revise the Table footnote to indicate that the asterisk refers to the capability to assign the "*" positions on the Table to the Fire Brigade as a collateral duty.

The net effect of the proposed changes will be to allow the Operations on-shift staffing complement to be reduced from thirteen to ten positions. This is accomplished by qualifying on-shift Maintenance and E&RC personnel to perform Fire Brigade duties. Such training would be completed prior to making any adjustments in the on-shift staffing levels.

Basis

The CP&L evaluation consisted of the following activities:

- A review of existing on-shift staffing levels and validation of existing staffing against Table 2.2-1 of the HNP Emergency Plan (PLP-201).
- A comparison of the on-shift staffing requirements established in Table 2.2-1 of the HNP Emergency against the staffing guidance outlined in Table B-1 of NUREG 0654.
- An assessment and development of proposed modifications to Table 2.2-1 of the HNP Emergency Plan to align on-shift staffing levels / options with Table B-1 of NUREG 0654.
- A review of NRC Information Notice 95-48 and supporting material against the HNP staffing and event response practices.



100

100

100

100

100

- A determination of the "most limiting" staffing requirements (greatest number of on-shift staff required) for each affected organization, considering administrative control actions and the sequence of performing response actions. For Operations, the event postulated was a fire in the Main Control Room with transfer of controls to the Auxiliary Control Panel, with a loss of offsite power. Although overly conservative, for E&RC, a scenario similar to that described in Information Notice 95-48 was used, involving a fire resulting in a reactor trip, with a design basis accident involving a steam generator tube rupture with a stuck open steam generator PORV.
- Based upon these "most limiting" scenarios, an evaluation of existing and proposed on-shift staffing levels needed to ensure a safe shutdown of the reactor following the event (including those actions implementing emergency operating procedures, performing required notifications, establishing and maintaining communications with the NRC and plant management, and any additional duties assigned by the plant's administrative controls).

Therefore, based on the results of the assessment conducted commensurate with Information Notice 95-48, and as evaluated by the 10 CFR 50.54(q) plant review of the changes proposed by this request, the level of effectiveness of the HNP Emergency Preparedness Program will not be degraded by the proposed modification to Table 2.2-1 of the HNP Emergency Plan.

ENCLOSURE TO SERIAL: HNP-96-047

ENCLOSURE 2

PROPOSED REVISION TO TABLE 2.2-1
OF THE HNP EMERGENCY PLAN

.....

.....

.....

.....