ENCLOSURE 4
SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
PROPOSED SPECIFIC TIME LIMIT TO PLACE CHANNEL IN BYPASS

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ENCLOSURE 5
SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
PROPOSED SPECIFIC TIME LIMIT TO PLACE CHANNEL IN BYPASS

TECHNICAL SPECIFICATION PAGES

TABLE 3.3-3 (Continued)

TABLE NOTATIONS

*The provisions of Specification 3.0.4 are not applicable.

#Trip function may be blocked in this MODE below the P-11 (Pressurizer Pressure Interlock) Setpoint.

**During CORE ALTERATIONS or movement of irradiated fuel in containment, refer to Specification 3.9.9.

***Trip function automatically blocked above P-11 and may be blocked below P-11 when Safety Injection on low steam line pressure is not blocked.

ACTION STATEMENTS

ACTION 14 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours; however, one channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1, provided the other channel is OPERABLE.

ACTION 15 - With the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed until performance of the next required CHANNEL OPERATIONAL TEST provided the inoperable channel is placed in the tripped condition within 1 hour.

ACTION 16 - With the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed provided the inoperable channel is placed in the bypassed condition within 6 hours and the Minimum Channels OPERABLE requirement is met. One additional channel may be bypassed for up to 2 hours for surveillance testing per Specification 4.3.2.1.

ACTION 17 - With less than the Minimum Channels OPERABLE requirement, operation may continue provided the Containment Purge Makeup and Exhaust Isolation valves are maintained closed while in MODES 1, 2, 3 and 4 (refer to Specification 3.6.1.7). For MODE 6, refer to Specification 3.9.4.

ACTION 18 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

TABLE 3.3-3 (Continued)

TABLE NOTATIONS

*The provisions of Specification 3.0.4 are not applicable.

#Trip function may be blocked in this MODE below the P-11 (Pressurizer Pressure Interlock) Setpoint.

**During CORE ALTERATIONS or movement of irradiated fuel in containment, refer to Specification 3.9.9.

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ACTION 18 - With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

cc: Ms. D. B. Alexander
Ms. P. B. Brannan
Mr. H. K. Chernoff (RNP)
Mr. G. W. Davis
Mr. J. W. Donahue
Ms. S. F. Flynn
Mr. H. W. Habermeyer, Jr.
Mr. W. J. Hindman
Ms. W. C. Langston (PE&RAS File)
Mr. R. D. Martin
Mr. W. S. Orser
Mr. G. A. Rolfson
Mr. R. S. Stancil
Mr. M. A. Turkal (BNP)
Mr. T. D. Walt
Nuclear Records
File: H-X-511
File: HI/A-2D

Request:
Define the current pressure testing boundaries and correlate the specific fuel oil piping lines with the appropriate ASME Code subarticle paragraph (item) number that provides acceptable alternative testing guidance.

Response:

1. Harris Nuclear Plant Technical Specification 4.8.1.1.2.h.2 currently requires "performing a pressure test of those portions of the diesel fuel oil system designed to Section III, Subsection ND of the ASME Code at a test pressure equal to 110% of the system design pressure" at least once per 10 years. This testing requirement currently applies to the diesel fuel oil system piping and components between the main fuel oil storage tanks and the diesel engines. More specifically, the following portions of the fuel oil system are included:
(Please reference the "red" color-coded portions on drawings, CAR-2165-G-063 and CAR-2165-G-133, which were included in our January 31, 1997 submittal)

   - Fuel Oil Day Tanks 1A-SA and 1B-SB
   - The fuel oil lines from the fuel oil storage tanks to the fuel oil day tanks
   - The fuel oil transfer pumps and suction and discharge piping (Including fuel oil transfer pump instrument and vent lines)
   - The fuel oil supply and return lines between the day tanks and diesel engines
   - The diesel engine relief valves and fuel oil lines (from engines to day tanks)
   - The day tank vent, drain and level instrument lines

2. Based on ASME Code Section XI, Subarticle IWD-5223, the following testing clarifications are proposed:

   Subarticle IWD-5223, Item (b) states that "In the case of atmospheric storage tanks, the hydrostatic head, developed with the tank filled to its design capacity, shall be acceptable as the test pressure." The Fuel Oil Day Tanks 1A-SA and 1B-SB are atmospheric tanks and are therefore addressed by this section and would not require a 110% pressure test. The day tanks are above ground and can be visually inspected for leaks during normal operation.
   (Please reference the "purple" color-coded portions on Attachment 2 to this letter)

   Subarticle IWD-5223, Item (c) states that "For the purpose of the test, open ended portions of suction or drain lines from a storage tank extending to the first shutoff valve shall be considered as an extension of the storage tank." Several fuel oil lines extending from the main fuel oil storage tanks and the day tanks to the first shutoff valve are addressed by this section and therefore would not require a 110% pressure test. These lines can also be visually inspected during normal operation. Observation of adequate level in each of the tanks will ensure that the piping is full of oil during visual inspections.

   *This applies to the following lines:

3FO1-109SA-1	3FO1-168SA-1&2
3FO1-283SA-1&2	3FO4-9SA-1&2
3FO3-40SA-1	3FO2-44SA-1 (between isolation valve and day tank)
3FO2-42SA-1	3FO1-241SA-1
3FO1-237SA-1	3FO1-172SA-1
3FO2-50SA-1	3FO2-48SA-1 (between isolation valve and day tank)

   (Please reference the "green" color-coded portions on Attachment 2 to this letter)

Subarticle IWD-5223, Item (e) states that "Open ended vent and drain lines from components extending beyond the last shutoff valve and open ended safety and relief valve discharge lines shall be exempt from the hydrostatic test." The vent, drain and relief valve lines associated with the day tanks are addressed by this section and therefore should be exempted from the 110% hydrostatic test.

*This applies to the following lines:

3FO3-46SA-1
3FO5-56SA-1
3FO1¼-243SA-1

(Please reference the "blue" color-coded portions on Attachment 2 to this letter)

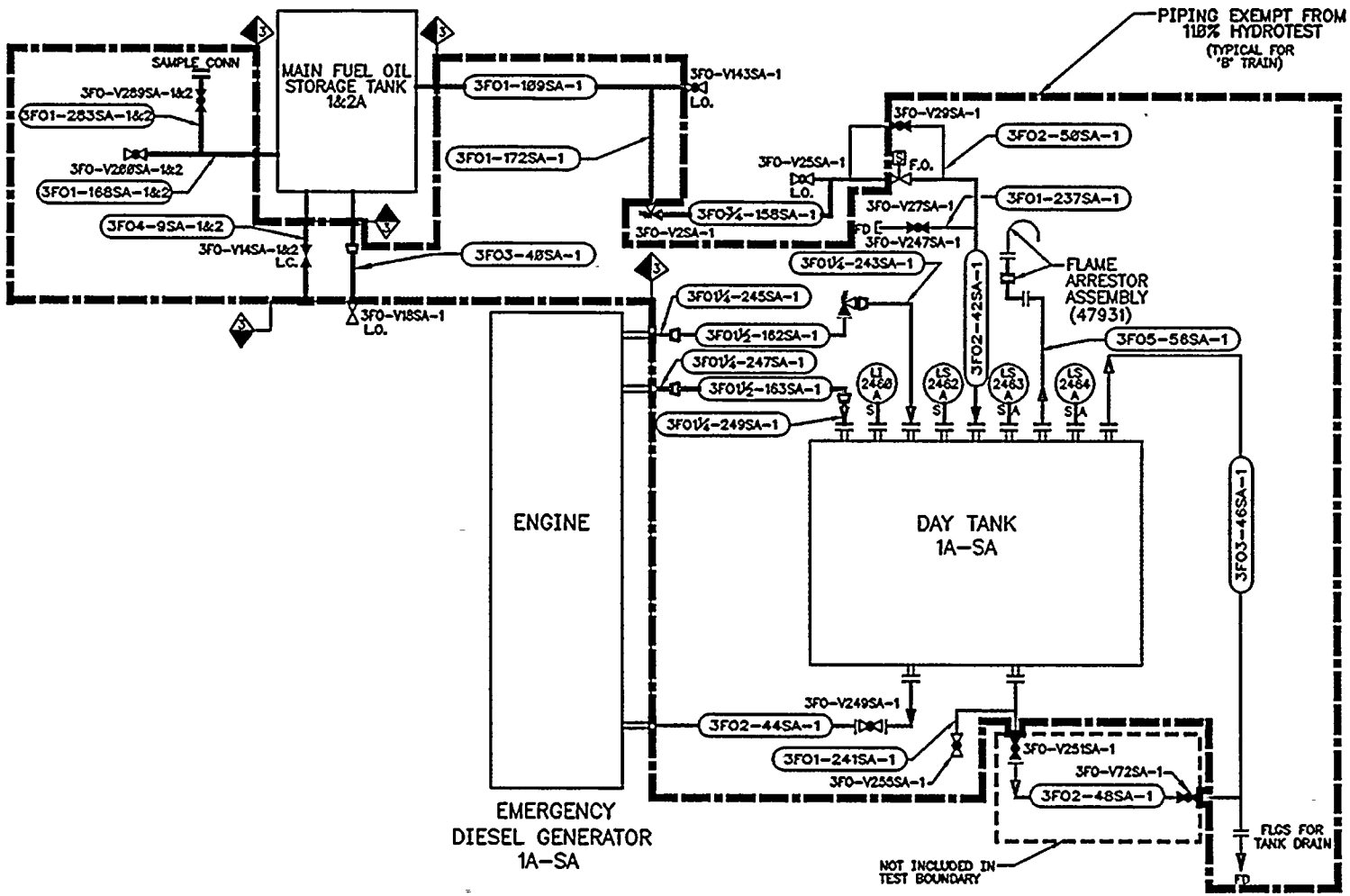
3. Table IWD-2500-1, Item D2.10, Note (1) states that "The system boundary extends up to and including the first normally closed valve or valve capable of automatic closure as required to perform the safety-related system function." Since the day tank floor drain isolation valves (3FO-V251SA-1 and 3FO-V72SA-1) are normally closed, line 3FO2-48SA-1 will not be included in the test boundary.

*This applies to the following line:

3FO2-48SA-1

(Please reference the "orange" color-coded portion on Attachment 2)

*Note: These are the "A" train lines only and are typical of the corresponding "B" train lines.



LEGEND

- 110% PRESSURE TEST
- IWD 5223(B)
- IWD 5223(C)
- IWD 5223(E)
- TABLE IWD-2500-1 ITEM D2.10 NOTE 1

DIESEL FUEL OIL SYSTEM SCHEMATIC

PIPING EXEMPT FROM 110% PRESSURE TEST (TYPICAL)