CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9907150215 DOC.DATE: 99/07/09 NOTARIZED: YES DOCKET #
FACIL:50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
AUTH.NAME AUTHOR AFFILIATION
SCAROLA,J. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Records Management Branch (Document Control Desk)

SUBJECT: Application for amend to license NPF-63,relocated TS 3/4.3.3.3,TS 3/4.3.3.4,TS 3/4.3.3.9 & TS 3/4.3.3.11 to plant procedure PLP-114, "Relocated Tech Specs & Design Basis Requirements," IAW GL 95-10.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 10 +32
TITLE: OR Submittal: General Distribution

NOTES:Application for permit renewal filed. 05000400

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	LPD2-2 LA	1	1	LAUFER,R.	1	1
INTERNAL:	ACRS	1	1	FILE CENTER 01	1	1
	NRR/DE/EEIB	1	1	NRR/DSSA/SPLB	1	1
	NRR/DSSA/SRXB	1	1	NUDOCS-ABSTRACT	1	1
	OGC/RP	1	0			
EXTERNAL:	NOAC	1	1	NRC PDR	1	1

C A T E G O R Y 1 D O C U M E N T

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 11 ENCL 10

AA2

CP&L

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

James Scarola
Vice President
Harris Nuclear Plant

JUL 9 1999

SERIAL: HNP-99-108
10CFR50.90

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
RELOCATION OF SELECTED INSTRUMENTATION

Dear Sir or Madam:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L) requests a revision to the Technical Specifications (TS) for the Harris Nuclear Plant (HNP). The proposed amendment relocates TS 3/4.3.3.3, "Seismic Instrumentation, TS 3/4.3.3.4 "Meteorological Instrumentation", TS 3/4.3.3.9 "Metal Impact Monitoring System", and TS 3/4.3.3.11 "Explosive Gas Monitoring Instrumentation" to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". The proposed change is in accordance with guidance provided by Generic Letter 95-10, "Relocation of Selected Technical Specification Requirements Related to Instrumentation". Changes to relocated requirements will be performed in accordance with 10 CFR 50.59.

Enclosure 1 provides a 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 CP&L'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 is required for approval of this amendment request. 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.

Please refer any questions regarding this submittal to Mr. J. H. Eads at (919) 362-2646.

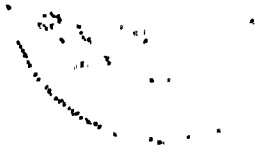
Sincerely,

James Scarola

James Scarola

A001

150025

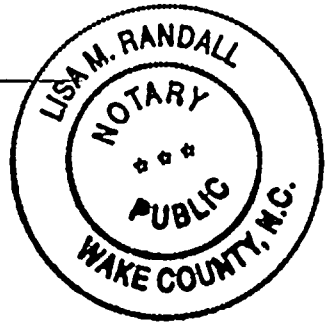


MSE/mse

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

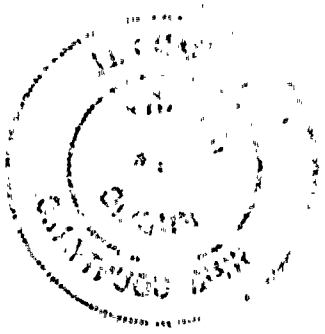
James Scarola, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief, and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.

Lisa M. Randall



Notary (Seal)
My commission expires: 6-7-2003

c: Mr. J. B. Brady, NRC Sr. Resident Inspector
Mr. Mel Fry, Acting Director, N.C. DEHNR
Mr. R. J. Laufer, NRC Project Manager
Mr. L. A. Reyes, NRC Regional Administrator



bc:

Ms. D. B. Alexander
Mr. G. E. Attarian
Mr. R. H. Bazemore
Mr. C. L. Burton
Mr. H. K. Chernoff
Mr. B. H. Clark
Mr. W. F. Conway
Mr. G. W. Davis
Mr. W. J. Dorman
Mr. R. J. Field
Mr. K. N. Harris
Ms. L. N. Hartz
Mr. W. J. Hindman
Mr. M. Janus
Mr. C. S. Hinnant
Mr. G. J. Kline
Mr. Brett Kruse
Ms. W. C. Langston
Mr. R. D. Martin
Mr. T. C. Morton
Mr. W. S. Orser
Mr. P. Summers
Mr. J. M. Taylor
Licensing File(s) (2 copies)
Nuclear Records

ENCLOSURE 1 TO SERIAL: HNP-99-108

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
RELOCATION OF SELECTED INSTRUMENTATION

BASIS FOR CHANGE REQUEST

Background

In 10 CFR 50.36, the NRC established the regulatory requirements related to the content of Technical Specifications (TS). The NRC developed criteria, as described in "The Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors", to determine which of the design conditions and associated surveillances should be located in the TS as limiting conditions for operation.

On December 15, 1995, the NRC issued Generic Letter (GL) 95-10, "Relocation of Selected Technical Specification Requirements Related to Instrumentation". GL 95-10 stated that several specifications did not warrant inclusion into TS. "Seismic Instrumentation", "Meteorological Instrumentation", "Loose-Part Detection System (Metal Impact Monitoring System)", and "Explosive Gas Monitoring Instrumentation" were identified in GL 95-10 as candidates for relocation to licensee-controlled documents.

Proposed Change

Harris Nuclear Plant (HNP) proposes relocating Technical Specifications (TS) 3/4.3.3.3, "Seismic Instrumentation", TS 3/4.3.3.4 "Meteorological Instrumentation", TS 3/4.3.3.9 "Metal Impact Monitoring System", and TS 3/4.3.3.11 "Explosive Gas Monitoring Instrumentation" to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements".

Basis

HNP proposes relocating TS 3/4.3.3.3, "Seismic Instrumentation", TS 3/4.3.3.4 "Meteorological Instrumentation", TS 3/4.3.3.9 "Metal Impact Monitoring System", and TS 3/4.3.3.11 "Explosive Gas Monitoring Instrumentation" to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". When these requirements have been relocated to this licensee-controlled document, any future changes will require a 10 CFR 50.59 evaluation. GL 95-10 states the NRC has approved the relocation of most of these specific instrumentation requirements in various amendments issued to specific licensees. The improved standard TS also reflect the staff position that these requirements do not meet the 10 CFR 50.36 criteria for inclusion in TS. The staff has also concluded that these provisions are not related to dominant contributors to plant risk.

PLP-114 is the current plant procedure for relocated Technical Specifications and Design Basis Requirements. Previous TS that have been relocated to PLP-114 include Turbine Overspeed Protection, Area Temperature Monitoring, and Gas Storage Tanks. In addition to a 10 CFR 50.59 evaluation, changes to PLP-114 currently require Plant Nuclear Safety Committee concurrence prior to implementation.

Seismic Monitoring Instrumentation

As described in GL 95-10, the capability of the plant to withstand a seismic event or other design basis accident is determined by the initial design and construction of systems, structures, and components. The instrumentation is used to alert operators to the seismic event and evaluate the plant response. The Final Policy Statement explained that instrumentation to detect precursors to reactor coolant boundary leakage, such as seismic instrumentation, is not included in the first criterion. The seismic instrumentation does not serve as a protective design feature or part of a primary success path for events which challenge fission product barriers. The staff has concluded that the seismic monitoring instrumentation does not satisfy the 10 CFR 50.36 criteria and need not be included in the TS. HNP proposes relocating the seismic monitoring instrumentation requirements to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". Subsequent changes to these provisions will be made in accordance with 10 CFR 50.59.

Meteorological Monitoring Instrumentation

GL 95-10 states the meteorological monitoring instrumentation does not serve such a primary protective function as to warrant inclusion in the TS in accordance with the 10 CFR 50.36 criteria. The instrumentation does not serve to ensure that the plant is operated within the bounds of initial conditions assumed in design basis accident and transient analysis or that the plant will be operated to preclude transients or accidents. Likewise, the meteorological instrumentation does not serve as part of the primary success path of a safety sequence analysis used to demonstrate that the consequences of these events are within the appropriate acceptance criteria. Accordingly, the staff has concluded that the meteorological instrumentation does not meet the 10 CFR 50.36 criteria and need not be included in the TS. Therefore, HNP proposes relocating meteorological monitoring instrumentation requirements from TS to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". Any changes made to the relocated meteorological monitoring instrumentation will be made in accordance with 10 CFR 50.59.

Metal Impact Monitoring System

The metal impact monitoring system (MIMS) is identified as the loose-part detection system in GL 95-10. The HNP MIMS identifies the existence of possible loose parts in the reactor coolant system. Early detection can give operators time to take corrective actions and avoid or mitigate damage to or malfunctions of primary system components. However, as discussed in the Final Policy Statement, the MIMS does not function to detect significant abnormal degradation of the reactor coolant pressure boundary. The MIMS does not serve as an active design feature for establishing initial conditions or mitigation of design basis accidents or transients. The staff has concluded that requirements for this system do not satisfy the 10 CFR 50.36 criteria and need not be included in TS. HNP will relocate the requirements of MIMS to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". Subsequent changes to the MIMS will be made in accordance with 10 CFR 50.59.

Explosive Gas Monitoring

The explosive gas monitoring instrumentation requirements address detection of possible precursors to the failure of the waste gas system but do not prevent or mitigate design basis accidents or transients which assume a failure of or present a challenge to a fission product barrier. Acceptable concentrations of explosive gases are actually controlled by other limiting conditions of operation (e.g. Explosive Gas Mixture). GL 95-10 states that the requirements

related to explosive gas monitoring instrumentation do not conform to the 10 CFR 50.36 criteria for inclusion in the TS. HNP proposes relocating explosive gas monitoring instrumentation requirements to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". Subsequent changes to Explosive Gas Monitoring will be made in accordance with 10 CFR 50.59. Additionally, TS Surveillance Requirement 4.11.2.5 references TS 3.3.3.11 which HNP proposes to relocate. HNP therefore, also proposes to remove reference to TS 3.3.3.11 from TS 3/4.11.2.5.

Conclusion:

As stated in GL 95-10, "The NRC has approved the relocation of most of these specific instrumentation requirements in various amendments issued to specific licensees. The improved standard TSs also reflect the staff position that these requirements do not meet the 10 CFR 50.36 criteria for inclusion in TSs. The staff has also concluded that these provisions are not related to dominant contributors to plant risk". Based on guidance provided in GL 95-10, HNP proposes to relocate these requirements to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements". Subsequent changes will be made in accordance with 10 CFR 50.59.

ENCLOSURE 2 TO SERIAL: HNP-99-108

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
RELOCATION OF SELECTED INSTRUMENTATION

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

Harris Nuclear Plant (HNP) proposes relocating Technical Specifications (TS) 3/4.3.3.3, "Seismic Instrumentation", TS 3/4.3.3.4 "Meteorological Instrumentation", TS 3/4.3.3.9 "Metal Impact Monitoring System", and TS 3/4.3.3.11 "Explosive Gas Monitoring Instrumentation" to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements".

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.

   Seismic Instrumentation, Meteorological Instrumentation, Metal Impact Monitoring System, and Explosive Gas Monitoring Instrumentation are not accident initiating components as described in the Final Safety Analysis Report. Seismic Instrumentation, Meteorological Instrumentation, Metal Impact Monitoring System, and Explosive Gas Monitoring Instrumentation are not accident mitigating components. There are no modifications being made to plant systems as a result of this change. Additionally, there are no changes being made to the way in which systems are being operated as a result of this change. Therefore, the proposed change does not involve a significant 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.

Seismic Instrumentation, Meteorological Instrumentation, Metal Impact Monitoring System, and Explosive Gas Monitoring Instrumentation are not accident initiating components as described in the Final Safety Analysis Report (FSAR). The proposed change relocates the TS requirements for Seismic Instrumentation, Meteorological Instrumentation, Metal Impact Monitoring System, and Explosive Gas Monitoring Instrumentation to plant procedure PLP-114. Plant systems and components are not modified as a result of this change. Future changes in these systems will be controlled in accordance with 10 CFR 50.59.

Therefore, the proposed change 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 to Seismic Instrumentation, Meteorological Instrumentation, Metal Impact Monitoring System, and Explosive Gas Monitoring Instrumentation does not affect any of the parameters that relate to the margin of safety as described in the Bases of the TS or the FSAR. Accordingly, NRC Acceptance Limits are not affected by this change. The proposed change relocates the TS requirements for Seismic Instrumentation, Meteorological Instrumentation, Metal Impact Monitoring System, and Explosive Gas Monitoring Instrumentation to plant procedure PLP-114. Plant systems and components are not modified as a result of this change. Future changes in these systems will be controlled in accordance with 10 CFR 50.59. Generic Letter 95-10 states that the staff has concluded that these provisions are not related to dominant contributors to plant risk.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
RELOCATION OF SELECTED INSTRUMENTATION

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 a significant 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

Harris Nuclear Plant (HNP) proposes relocating Technical Specifications (TS) 3/4.3.3.3, "Seismic Instrumentation", TS 3/4.3.3.4 "Meteorological Instrumentation", TS 3/4.3.3.9 "Metal Impact Monitoring System", and TS 3/4.3.3.11 "Explosive Gas Monitoring Instrumentation" to plant procedure PLP-114, "Relocated Technical Specifications and Design Basis Requirements".

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 increase in the amounts of any effluents that may be released offsite.

   The change does not introduce any new effluents or increase the quantities of existing effluents. 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 a significant increase in individual or cumulative occupational radiation exposure.

   The proposed change does not result in any physical plant changes or new surveillance which would require additional personnel entry into radiation controlled areas. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure. Therefore, the proposed amendment does not result in a significant increase in individual or cumulative occupational radiation exposure.

ENCLOSURE 4 TO SERIAL: HNP-99-108

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
RELOCATION OF SELECTED INSTRUMENTATION

PAGE CHANGE INSTRUCTIONS

Removed Page	Inserted Page
vi	vi
3/4 3-57	3/4 3-57
3/4 3-58	3/4 3-58
3/4 3-59	3/4 3-59
3/4 3-60	3/4 3-60
3/4 3-61	3/4 3-61
3/4 3-62	3/4 3-62
3/4 3-74	3/4 3-74
3/4 3-82	3/4 3-82
3/4 3-83	3/4 3-83
3/4 3-85	NA
3/4 3-86	3/4 3-86
3/4 3-88	NA
3/4 11-15	3/4 11-15
B3/4 3-4	B3/4 3-4
B3/4 3-5	B3/4 3-5
B3/4 3-6	B3/4 3-6