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SUBJECT: Forwards Rev 35 to PLP-201, "Emergency plan." More detailed description of changes made is provided in encl rev summary for PLP-201, rev 35.

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JUL 30 1999

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10 CFR 50.54(q)

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
CHANGE TO EMERGENCY PLAN (REVISION 35)

Dear Sir or Madam:

In accordance with 10 CFR 50.54(q), Carolina Power & Light Company hereby transmits one copy of Revision 35 to the Shearon Harris Nuclear Power Plant Emergency Plan (PLP-201). This revision replaces all pages of the previous revision with the exception of the Emergency Action Level (EAL) Flow Path, Side 1 & 2 and the Annex H, Operations Map and aperture card which were not changed by this revision.

Revision 35 to the Emergency Plan includes changes in the following areas:

1. Dose Assessment - The software, CPLDOSE, for performing dose assessment has been replaced with a Y2K compliant product, DAPAR, Dose Assessment and Protective Action Recommendations. The technical basis for dose assessment, PLP-201 Annex B, was removed from the Emergency Plan and placed in an emergency program maintenance procedure. Additional administrative changes have been incorporated to reflect the updated location of the technical basis.
2. SAMG Responsibilities - The ERM, SEC-TSC, and POD responsibility's of directing the implementation of SAMGs have been clarified to differentiate between the roles the leaders have in each facility.
3. Shift Staffing - Those positions which may support Rescue, First Aid, and Fire Brigade in Table 2.2.1. have been clarified to align with NUREG-0654.
4. Contract and Agreement Organizations - Clarifications have been made to the contracted and agreement organizations to distinguish roles.

A more detailed description of the changes made is provided in the enclosed Revision Summary for PLP-201, Rev. 35. Each of these changes have been evaluated by the plant staff as not decreasing the effectiveness of the Emergency Plan and have been implemented per 10 CFR 50.54(q).

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Questions regarding this matter may be referred to Mr. J. H. Eads at (919) 362-2646.

Sincerely,

D. B. Alexander

D. B. Alexander
Manager, Regulatory Affairs
Harris Nuclear Plant

MGW

Enclosures

c: Mr. J. B. Brady (NRC Senior Resident Inspector, HNP)
Mr. Rich Laufer (NRR Project Manager, HNP)
Mr. L. A. Reyes (NRC Regional Administrator, Region II) with two copies of procedure

Revision Summary for PLP-201, Rev. 35

An overview of the details of the changes are as follows:

Implementation of the Dose Assessment and Protective Action Recommendation Software. Annex B Technical Basis Of Emergency Dose Projection Program (CPLDOSE) was removed from the Emergency Plan. New procedures were added to the program for dose assessment: EPM-600, Dose Assessment Technical Basis and PEP-342, Dose Assessment

Enhancements to Annex A and Table G.1-1 for contracted organizations and clarification of Annex and Table titles.

Clarification of the POD, SEC-TSC, and ERM roles in SAMG.

Enhanced wording for Fire Brigade assignments for shift personnel to align with NUREG-0654.

Location	Change
2.4.1.C	Changed 'Direct implementation of Severe Accident Management Guidelines.' to 'The POD is trained as a SAMG decision maker whose focus is on the operational aspect of the strategy developed by the TSC.'
2.4.1.G	Changed 'on-shift operations.' to 'on-shift personnel.'
2.4.2.A.6.	Changed 'Direct implementation of Severe Accident Management Guidelines.' To 'A trained SAMG decision maker whose focus is on the development and prioritization aspect of the SAMG strategy.'
2.4.4.A.7:	Changed 'Direct implementation of Severe Accident Management Guidelines.' To 'A trained SAMG decision maker whose focus is on the offsite consequences of the strategy recommended by the TSC. The ERM has the ultimate approval authority for strategy implementation.'
Table 2.2-1	Changed Rescue and First Aid emergency positions column from 'Operations Personnel/Other Personnel' to 'Plant Personnel'.
Table 2.2-1	Changed note (d) from 'May also be assigned to Fire Brigade positions.' to 'May be provided by shift personnel assigned other functions.' to be consistent with the wording of NUREG-0654.
3.9.3.	Changed 'The isotopic mix is based upon a default mix discussed in Annex B.' to 'The isotopic mix is based upon the mix discussed in EPM-600.'
Table 4.2-1	Nuclear Mutual Limited has been changed to NEIL
4.4.3	Removed 'Annex B' from 'Dose projections will be made to determine the off-site doses that might result from an accident and the possible need for protective action (see 4.5.1)' Changed 'Annex B' to 'EPM-600' in 'Radionuclide mix assumptions in EPM-600 (the accident source term) are contained in the computerized dose projection program as default values for use until actual sampling data can be substituted.'

Revision Summary for PLP-201, Rev. 35

Location	Change
5.2.1.	Changed General Employee Training to Plant Access Training
Annex A	Changed Title from AGREEMENTS to LETTERS OF AGREEMENT and removed 'contract' from 2. and 3. Added or CP&L Contract Services to Copies of the original agreements are kept on file by HNP Emergency Preparedness or CP&L Contract Services.
Annex A	Removed 'Nuclear Power Plant Emergency Response Voluntary Assistance Agreement Signature Page.' This agreement does not meet the intent of an agreement organization and is not updated annually.
Annex A	Added Framatone, Becon, Raytheon, National Weather Service, and Murray and Trettle to Annex A.
Section I of Annex D	Removed references to Annex B.
Annex E	Removed reference to Annex B and added references to 'PEP-342, Core Damage Assessment' and 'EPM-600, Dose Assessment Technical Basis' and changed the reference to PEP-340 from Radiological Assessment to Dose Assessment.
Table G.1-1	Removed 'contracted' from the table title. Not all organizations are contracted but all support the HNP Emergency Plan.
Table G.1-1	Added the National Weather Service to the list.