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SUBJECT: Forwards marked up copy of approved FSAR Section 17.3 with applicable duplicated TS requirements, as committed in 990602 submittal.

NOTES:Application for permit renewal filed. 05000400

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Carolina Power & Light Company  
Harris Nuclear Plant  
P.O. Box 165  
New Hill NC 27562

SERIAL: HNP-99-136  
10 CFR 50.90

SEP 1 1999

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  
TECHNICAL SPECIFICATIONS 6.5, 6.8, AND 6.10  
SUPPLEMENTAL INFORMATION

Dear Sir or Madam:

On June 2, 1999, Harris Nuclear Plant (HNP) submitted a request for revision to the Technical Specifications (TS) for the HNP. The proposed amendment revises TS 6.5, "REVIEW AND AUDIT", TS 6.8 "PROCEDURES AND PROGRAMS" and TS 6.10 "RECORD RETENTION". In the submittal dated June 2, 1999, HNP committed to relocating applicable portions of TS section 6 to the Quality Assurance Program Description (QAPD) located in Section 17.3 of the HNP Final Safety Analysis Report (FSAR).

Enclosed is a marked up copy of the approved HNP FSAR Section 17.3 with applicable duplicated TS requirements.

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

Sincerely,



Donna B. Alexander  
Manager-Regulatory Affairs  
Harris Nuclear Plant

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Enclosure:

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ENCLOSURE TO SERIAL: HNP-99-136

SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
REQUEST FOR LICENSE AMENDMENT  
TECHNICAL SPECIFICATIONS 6.5 ,6.8, AND 6.10  
SUPPLEMENTAL INFORMATION

HNP FSAR SECTION 17.3.4

Independent assessment results are documented and reviewed with management personnel responsible for the areas assessed.

Results of independent assessments, special investigations, and analysis of data will be provided to NAS management for review. A periodic briefing of NAS activities, along with potential issues and recommendations, shall be presented to the Senior Vice President and Chief Nuclear Officer - Nuclear Generation Group.

Follow-up is accomplished to assure that corrective action is taken as a result of the assessment and that deficient areas are reassessed, when necessary, to verify implementation of adequate corrective actions.

*Insert*

#### 17.3.4 Administrative Controls

This section was added to the FSAR to relocate certain administrative controls from Technical Specifications. These relocated administrative controls include Review and Audit, Procedure Review Requirements, and Record Retention.

##### 17.3.4.1 Review and Audit

##### 17.3.4.1.1 Safety and Technical Reviews

##### 17.3.4.1.1.1 General Program Control

A safety and a technical evaluation shall be prepared for each of the following:

- a. All procedures and programs required by Technical Specification 6.8, other procedures that affect nuclear safety, and changes thereto;
- b. All proposed tests and experiments that are not described in the Final Safety Analysis Report; and
- c. All proposed changes or modifications to plant systems or equipment that affect nuclear safety.

##### 17.3.4.1.1.2 Technical Evaluations

- a. Technical evaluations will be performed by personnel qualified in the subject matter and will determine the technical adequacy and accuracy of the proposed activity. If interdisciplinary evaluations are required to cover the technical scope of an activity, they will be performed.
- b. Technical review personnel will be identified by the responsible Manager or his designee for a specific activity when the review process begins.

##### 17.3.4.1.1.3 Qualified Safety Reviewers

The Plant General Manager shall designate those individuals who will be responsible for performing safety reviews described in section 17.3.4.1.1.4. These individuals shall have a baccalaureate degree in an engineering or related field or equivalent, and 2 years of related experience. Such designation shall include the disciplines or procedure categories for which each individual is qualified. Qualified individuals or groups not on the plant staff may be relied upon to perform safety reviews if so designated by the Plant General Manager.

#### 17.3.4.1.1.4 Safety Evaluations and Approvals

- a. The safety evaluation prepared in accordance with section 17.3.4.1.1.1 shall include a written determination, with basis, of whether or not the procedures or changes thereto, proposed tests and experiments and changes thereto, and modifications constitute an unreviewed safety question as defined in Paragraph 50.59 of 10 CFR Part 50, or whether they involve a change to the Final Safety Analysis Report, the Technical Specifications, or the Operating License.
- b. The safety evaluation shall be prepared by a qualified individual. The safety evaluation shall be reviewed by a second qualified individual.
- c. A safety evaluation and subsequent review that conclude that the subject action may involve an unreviewed safety question, a change to the Technical Specifications, or a change to the Operating License, will be referred to the Plant Nuclear Safety Committee (PNSC) for their review in accordance with section 17.3.4.1.2.5. If the PNSC recommendation is that an item is an unreviewed safety question, a change to the Technical Specifications, or a change to the Operating License, the action will be referred to the Commission for approval prior to implementation. Implementation may not proceed until after review by the Nuclear Assessment Section (NAS) in accordance with section 17.3.4.1.3.4.
- d. If a safety evaluation and subsequent review conclude that the subject action does not involve an unreviewed safety question, a change to the Technical Specification, or a change to the Operating License, the action may be approved by the Plant General Manager or his designee or, as applicable, by the Manager of the primary functional area affected by the action. The individual approving the action shall assure that the reviewers collectively possess the background and qualification in all of the disciplines necessary and important to the specific review for both safety and technical aspects.
- e. A safety evaluation and subsequent review that conclude that the modifications, procedures, tests or experiments which constitute a change to the facility as described in the Final Safety Analysis Report shall be referred to the Nuclear Assessment Section for review in accordance with section 17.3.4.1.3.4, but implementation may proceed prior to the completion of that review.
- f. The individual approving the procedure, tests, or experiment or change thereto shall be other than those who prepared the safety evaluation or performed the safety review.

#### 17.3.4.1.2 Plant Nuclear Safety Committee (PNSC)

##### 17.3.4.1.2.1 Function

The PNSC shall function to advise the Plant General Manager on all matters related to nuclear safety.

#### 17.3.4.1.2.2 Composition

- a. The PNSC will be composed of seven to nine members. Members and the Chairman shall be designated in writing by the Plant General Manager. The members shall represent the engineering, operations, maintenance, health physics/chemistry, nuclear assessment and regulatory affairs functions.
- b. The Chairman may designate in writing other regular members who may serve as Acting Chairman of PNSC meetings. The Chairman shall have a bachelor's degree in an engineering or science field or equivalent, and, in addition, shall have 10 years of power plant experience of which 3 years shall be nuclear power plant experience. The other members (and any alternates) shall have a bachelor's degree in an engineering or science field or equivalent and, in addition, shall have a minimum of 5 years technical experience of which a minimum of 3 years shall be in one or more of the areas listed above. Members without an applicable bachelor's degree shall have a minimum of 10 years technical experience, of which a minimum of 3 years shall be in one or more of the areas listed above. No more than two alternates shall participate as voting members in PNSC activities at any one time.

#### 17.3.4.1.2.3 Meeting Frequency

The PNSC shall meet at least once per calendar month and as convened by the PNSC Chairman or his designated alternate. The PNSC must meet in session to perform its function under these Technical Specifications.

#### 17.3.4.1.2.4 Quorum

The quorum of the PNSC necessary for the performance of the PNSC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

#### 17.3.4.1.2.5 Responsibilities

The PNSC shall be responsible for:

- a. Review of proposed procedures or changes thereto that have been initially determined to constitute an unreviewed safety question or involve an unreviewed change to the Technical Specifications;
- b. Review of all proposed tests and experiments that affect nuclear safety and that have been initially determined to appear to constitute an unreviewed safety question or involve an unreviewed change to the Technical Specifications;
- c. Review of all proposed changes to Appendix "A" Technical Specifications;

- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety and that have been initially determined to appear to constitute an unreviewed safety question as defined in 10 CFR 50.59 or involve a change to the Technical Specifications;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President - Harris Nuclear Plant;
- f. Review of all Reportable Events;
- g. Review of unit operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Manager - Nuclear Assessment Section;
- i. Review of the Security Plan;
- j. Review of the Emergency Plan;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Vice President - Harris Nuclear Plant;
- l. Review, prior to implementation, of changes to the Offsite Dose Calculation Manual, the Process Control Program, the Radwaste Treatment Systems, and the Technical Specification Equipment List Program.

#### 17.3.4.1.2.6 Requirements

The PNSC shall:

- a. Render determinations in writing with regard to whether or not each item considered under section 17.3.4.1.2.5.a. through e. constitutes an unreviewed safety question; and
- b. Provide written notification within 24 hours to the Vice President - Harris Nuclear Plant of disagreement between the PNSC and the Plant General Manager. However, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.



#### 17.3.4.1.2.7 Records

The PNSC shall maintain written minutes of each PNSC meeting that, at a minimum, document the results of all PNSC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Vice President - Harris Nuclear Plant and the Manager - Nuclear Assessment Section.

#### 17.3.4.1.3 Nuclear Assessment Section Independent Review Program

##### 17.3.4.1.3.1 Function

The Nuclear Assessment Section shall function to provide independent review of plant changes, tests, and procedures; verify that Reportable Events are investigated in a timely manner and corrected in a manner that reduces the probability of recurrence of such events; and detect trends that may not be apparent to a day-to-day observer.

##### 17.3.4.1.3.2 Organization

The individuals assigned responsibility for independent reviews shall be technically qualified in a specified technical discipline or disciplines. These individuals shall collectively have the experience and competence required to review activities in the following areas:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Nondestructive testing,
- f. Instrumentation and control,
- g. Radiological safety,
- h. Mechanical and electrical engineering,
- i. Administrative controls,
- j. Seismic and environmental,
- k. Quality assurance practices, and
- l. Other appropriate fields.

##### 17.3.4.1.3.3 Requirements

- a. The Manager - Nuclear Assessment Section shall have a bachelor degree in an engineering or related field and, in addition, shall have a minimum of 10 years' related experience, of which a minimum of 5 years shall be in the operation and/or design of nuclear power plants.

b. The individuals performing independent safety reviews shall have a bachelor degree in an engineering or related field or equivalent and, in addition, shall have a minimum of 5 years' related experience.

c. An individual may possess competence in more than one specialty area. If sufficient expertise is not available within the Nuclear Assessment Section, competent individuals from other Carolina Power & Light Company organizations or outside consultants shall be utilized in performing independent reviews and investigations.

d. The documents submitted under 17.3.4.1.3.4 shall be reviewed by individuals meeting the requirements of 17.3.4.1.3.2 and 17.3.4.1.3.3.b. to ensure disciplines are encompassed. Multiple reviews will be conducted on documents where required to meet applicable disciplines of section 17.3.4.1.3.2.

e. Independent safety reviews shall be performed by individuals not directly involved with the activity under review or responsible for the activity under review.

f. The Nuclear Assessment Section independent safety review program shall be conducted in accordance with written, approved procedures.

#### 17.3.4.1.3.4      Review

The Nuclear Assessment Section shall perform reviews of the following:

a. Written safety evaluations of changes in the facility as described in the Safety Analysis Report, changes in procedures as described in the Safety Analysis Report, and tests or experiments not described in the Safety Analysis Report which are completed without prior NRC approval under the provisions of 10CFR50.59(a)(1). These reviews are to verify that such changes, tests, or experiments do not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10CFR50.59(a)(2). These reviews may be conducted after appropriate management approval, and implementation may proceed prior to completion of the review.

b. Proposed changes in procedures required by the Technical Specifications, proposed changes in the facility, or proposed tests or experiments, any of which involve a change in the Technical Specifications or an unreviewed safety question pursuant to 10CFR50.59(a)(2) prior to implementation.

c. Proposed changes to the Technical Specifications or the Operating License prior to implementation.

d. Violations, deviations and Reportable Events, which require reporting to the NRC in writing, such as:

1) Violations of applicable codes, regulations, orders, Technical Specifications, license requirements or internal procedures or instructions having safety significance,

2) Significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components, and

3) Reportable Events, as specified in 10CFR50.73.

e. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

f. Any other matter involving safe operation of the nuclear power plant that the Manager - Nuclear Assessment Section, deems appropriate for consideration or which is referred to the Manager- Nuclear Assessment Section, by the on-site operating organization, Plant Nuclear Safety Committee (PNSC) or by other functional organizational units within Carolina Power & Light Company.

#### 17.3.4.1.3.5 Records

Results of Nuclear Assessment Section independent safety reviews shall be documented and retained.

#### 17.3.4.1.4 Nuclear Assessment Section Assessment Program

##### 17.3.4.1.4.1 Assessments of Facility Activities.

Assessments of facility activities shall be performed by the Nuclear Assessment Section. Assessments will be performance based and will be scheduled based on plant performance and importance to safety but at a frequency not to exceed 24 months . These assessments shall encompass:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training and qualifications of the entire facility staff.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.

d. The performance of activities required by the QA Program to meet the criteria of Appendix B, 10 CFR Part 50.

e. Any other area of facility operation considered appropriate by the Vice President - Harris Nuclear Plant.

f. The Radiological Environmental Monitoring Program and the results thereof.

g. The Off-Site Dose Calculation Manual and implementing procedures.

- h. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes.

17.3.4.1.4.2 Assessments of Activities Prescribed by Title 10 of the CFR.

Assessments of activities prescribed by Title 10 of the Code of Federal Regulations will be performed at the frequencies prescribed by the applicable regulation. These assessments shall encompass:

- a. Emergency Preparedness (per 10 CFR 50.54(t))
- b. Security (per 10 CFR 50.54(p))
- c. Radiation Protection (per 10 CFR 20.1101(c))

17.3.4.1.4.3 Independent Safety Engineering Group Organization Requirements.

The NAS shall include at least three individuals to perform the Independent Safety Engineering Group (ISEG) function. Each reviewer shall have a bachelor's degree in engineering or related science or equivalent and at least two years professional level experience in his field, at least one year of which shall be in the nuclear field.

17.3.4.1.4.3.1 Review Responsibilities.

The NAS shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design information which may indicate areas of improving unit safety. Review responsibilities shall also include plant operations, modifications, maintenance, and surveillances to verify independently that these activities are performed safely and correctly and that human errors are reduced as much as practical.

17.3.4.1.5 Outside Agency Inspection and Audit Program

- a. An independent fire protection and loss prevention inspection and audit shall be performed at least once per 12 months using either qualified offsite licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.
- c. Copies of the audit reports and responses to them shall be forwarded to the Vice President - Harris Nuclear Plant and the Manager - Nuclear Assessment Section.

#### 17.3.4.2        Proceduré Review Requirements

##### 17.3.4.2.1       Procedure Revisions

Each procedure of Technical Specification 6.8.1, and changes thereto, shall be reviewed and approved in accordance with section 17.3.4.1.1 prior to implementation and reviewed periodically as set forth in administrative procedures.

##### 17.3.4.2.2       Temporary Changes

Temporary changes to procedures of Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and
- c. The change is documented, reviewed in accordance with section 17.3.4.1.1, and approved within 14 days of implementation by the Plant General Manager or by the Manager of the functional area affected by the procedure.

#### 17.3.4.3        Record Retention

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

##### 17.3.4.3.1       Five Year Records

The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
- c. All Reportable Events;
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;
- e. Records of changes made to the procedures required by Specification 6.8.1;
- f. Records of radioactive shipments;

- g. Records of sealed source and fission detector leak tests and results; and
- h. Records of annual physical inventory of all sealed source material of record.

17.3.4.3.2 Records retained for the duration of the unit OL

The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of radiation exposure for all individuals entering radiation control areas;
- d. Records of gaseous and liquid radioactive material released to the environs;
- e. Records of transient or operational cycles for those unit components identified in Technical Specifications Table 5.7-1;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to the Technical Specifications;
- i. Records of quality assurance activities required by the Corporate Quality Assurance Program;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings of the PNSC;
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Technical Specification 3.7.8 including the date at which the service life commences and associated installation and maintenance records;
- m. Records of secondary water sampling and water quality;
- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed;

- o. Records of facility radiation and contamination surveys;
- p. Records of independent reviews; and
- q. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program.