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AUTH. NAME ZIMMERMAN, S. R.	AUTHOR AFFILIATION Carolina Power & Light Co.	
RECIP, NAME DENTON, H. R.	RECIPIENT AFFILIATION Office of Nuclear Reactor Regulation, Director (po	st 851125

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SUBJECT: Forwards addl info re implementation of Rev 1 to Reg Guide 1.127, "Insp of Water-Control structures Associated w/nuclear Power Plants." SER (NUREG-1038) & Tech Specs should be revised as indicated.

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NOTES: Application for permit renewal filed.

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#### **Carolina Power & Light Company**

JUN 3 1966

SERIAL: NLS-86-206

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation United States Nuclear Regulatory Commission Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT UNIT NO. 1 - DOCKET NO. 50-400 DRAFT TECHNICAL SPECIFICATION ON MAXIMUM SEDIMENT DEPTH

Dear Mr. Denton:

As requested by a member of your staff, Carolina Power & Light Company (CP&L) submits additional information regarding the implementation of Regulatory Guide 1.127 (Revision 1), "Inspection of Water-Control Structures Associated with Nuclear Power Plants." CP&L also requests that the Safety Evaluation Report (NUREG-1038) and the Technical Specifications be revised as indicated in the attachments to this letter.

Attachment 1 provides the CP&L position and the justification for the Technical Specification change. Attachment 2 provides the proposed changes to the Technical Specifications.

If you have any questions, please contact me at your convenience.

Yours very truly,

S. R. Zimmerman Manager Nuclear Licensing Section

SDC/pgp (3958SDC)

Attachments

- cc: Mr. B. C. Buckley (NRC) Mr. G. F. Maxwell (NRC-SHNPP) Dr. J. Nelson Grace (NRC-RII) Mr. Travis Payne (KUDZU) Mr. Daniel F. Read (CHANGE/ELP) Wake County Public Library Mr. Wells Eddleman Mr. R. Gonzalez
- Mr. John D. Runkle Dr. Richard D. Wilson Mr. G. O. Bright (ASLB) Dr. J. H. Carpenter (ASLB) Mr. J. L. Kelley (ASLB) Mr. T. S. Moore (ASLAB) Dr. R. L. Gotchy (ASLAB) Mr. H. A. Wilber (ASLAB)



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### ATTACHMENT I

### Shearon Harris Nuclear Power (SHNPP) Safety Evaluation Report (SER) (NUREG-1038), Section 2.4.11.2, Page 2-26

Because plant site drainage, including overland runoff, flows into the ESWI and ESWD channels, there is a potential for sediment to build up in these channels and in the auxiliary reservoir channel and the auxiliary reservoir, especially while heavy construction is still in progress. The applicant has furnished cross-sectional and profile data for the channels. These data show very little sediment buildup, except in the ESWD channel where as much as 3.5 feet of sediment has accumulated close to the discharge structure. However, the staff expects that this sediment will not accumulate once the plant is in operation and there is flow through the channel.

To preclude sediment from building up to an unacceptable level during operation, the ) applicant has committed to monitor the channels for sediment buildup in accordance with Regulatory Guide 1.127, Revision 1. Details of the monitoring program have not been provided; however, the details which will define the depth of sediment that will be allowed to accumulate before removal is necessary and a procedure for removal will be included in a Technical Specification that will be required by the staff at the appropriate stage of staff review before plant operation begins.

#### **Response:**

CP&L reaffirms our commitment to Regulatory Guide 1.127, Revision 1. CP&L has been performing inspections, in accordance with this Regulatory Guide, since the reservoir was filled in 1981. The data indicates very little sediment buildup and no significant change in channel flow area. Therefore, CP&L requests that the staff revise the SER to delete the requirement that the Technical Specifications define the depth of sediment that will be allowed to accumulate before removal is necessary.

Regulatory Guide 1.127 recommends that inspections be performed at periodic intervals to check the conditions of the water-control structures and to evaluate their operational adequacy. Specifically, it recommends that channels be examined for any conditions that may impose constraints on the functioning of the structure. Given any significant change, an evaluation should be performed to determine whether performance would be adversely affected.

In terms of the Emergency Service Water Intake and Discharge Channels, CP&L examines the channels in terms of cross-sectional flow area. This type of performance evaluation is much more appropriate than a single parameter monitoring/action point; i.e., channel cross-sectional flow area vs. maximum sediment depth, as proposed in 6.8.4(F)(3). Therefore, CP&L requests that the SHNPP Technical Specifications be revised as indicated in Attachment 2.







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#### ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

c. <u>Secondary Water Chemistry (Continued)</u>

SHNPP REVISION-

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- 6. A procedure identifying (a) the authority responsible for the interpretation of the data and (b) the sequence and timing of administrative events required to initiate corrective action.
- d. <u>Backup Method for Determining Subcooling Margin</u>

A program that will ensure the capability to monitor accurately the Reactor Coolant System subcooling margin. This program shall include the following:

- 1. Training of personnel, and
- 2. Procedures for monitoring.
- e. <u>Post-Accident Sampling</u>

A program that will ensure the capability to obtain and analyze, under accident conditions, reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere. samples. The program shall include the following:

- 1. Training of personnel,
- 2. Procedures for sampling and analysis, and
- 3. Provisions for maintenance of sampling and analysis equipment.
- f. Inspections of Water Control Structures

A program to implement an ongoing inspection program in accordance with Regulatory Guide 1.127 (Revision 1, March 1978) for the main and auxiliary dams, the auxiliary separating dike, the emergency service water, and discharge channels, and the auxiliary reservoir channel. The program shall include the following:

- Lintake.
- 1. The provisions of Regulatory Guide 1.127, Revision 1, to be implemented as a part of plant startup operations.
- 2. Subsequent inspections at yearly intervals for at least the next 3 years. If adverse conditions are not revealed by these inspections, inspection at 5-year intervals will be performed.

The program shall specify a maximum sedimont depth that will be \_\_\_\_\_ \_\_\_\_permitted to accumulate in the channels before removal is \_\_\_\_\_\_

SHEARON HARRIS - UNIT 1

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