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DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post 851125

SUBJECT: Forwards addl comments on Tech Spec Sections 6.4 & 4.6.2.1.b re training & surveillance requirements for depressurization & cooling sys, respectively & Figure 6-2.1 re corporate organization. Final draft Tech Specs encl.

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	PWR-A PD2 PD	1	1	BUCKLEY, B 01	2	2
	PWR-A PSB	1	1	PWR-A RSB	1	1
INTERNAL:	ADM/LFMB	1	0	ELD/HDS1	1	0
	IE FILE	1	1	IE/DEPER/EPB 36	1	1
	IE/DQAVT/QAB 21	1	1	NRR BWR ADTS	1	0
	NRR PWR-B ADTS	1	0	NRR ROE, M. L	1	1
	NRR/DHFT/MTB	1	1	REG FILE 04	1	1
	RGN2	3	3	RM/DDAMI/MIB	1	0
EXTERNAL:	BNL(AMDTS ONLY)	1	1	DMB/DSS (AMDTS)	1	1
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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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

SUBJECT: Forwards add'l comments on Tech Spec Sections 4.9 & 4.6 & 3.1.b re training & surveillance requirements for depressurization & cooling sys,respectively & Figure 6-2.1 re corporate organization.Final draft Tech Specs encl.

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INTERNAL:	ADM/LFMB	1	0	ELD/HDS1	1	0
	IE FILE	1	1	IE/DEPER/EPB 36	1	1
	IE/DQAVT/QAB 21	1	1	NRR BWR ADTS	1	0
	NRR PWR-B ADTS	1	0	NRR ROE,M.L	1	1
	NRR/DHFT/MTB	1	1	REG FILE 04	1	1
	RGN2	3	3	RM/DDAMI/MIB	1	0
EXTERNAL:	BNL(AMDTS ONLY)	1	1	DMB/DSS (AMDTS)	1	1
	LPDR 03	1	1	NRC PDR 02	1	1
	NSIC 05	1	1	PNL GRUEL,R	1	1

TOTAL NUMBER OF COPIES REQUIRED: LTTR 30 ENCL 25

CP&L

Carolina Power & Light Company

SERIAL: NLS-86-377

SEP 29 1986

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
TECHNICAL SPECIFICATION COMMENTS

Dear Mr. Denton:

Carolina Power & Light Company submits additional comments on the Shearon Harris Nuclear Power Plant Technical Specifications (TS). Attachment 1 provides two comments (Record Nos. 806 and 807) on the TS as well as justification for each comment. Attachment 2 provides a marked-up copy of four TS pages for the corresponding comments in Attachment 1.

If you have any questions, please contact Mr. Gregg A. Sinders at (919) 836-8168.

Yours very truly,

S. R. Zimmerman
Manager
Nuclear Licensing Section

GAS/pgp (5017GAS)

Attachments

cc: Mr. R. A. Benedict
Mr. B. C. Buckley (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
Dr. J. Nelson Grace (NRC-RII)

411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

A001
1/1

Attachment 1 to NLS-86-377

Final Draft TS Comments

CP&L Comments

SHNPP Final Draft Technical Specifications

Record Number: 806

Comment Type: ERROR

LCO Number: 6.4

Page Number: 6-3 & 7

Section Number: 6.4 & FIG 6-2.1

Comment:

IN BOTH THE FIGURE AND IN SECTION 6.4 CHANGE THE TITLE "DIRECTOR HARRIS TRAINING UNIT" TO "MANAGER HARRIS TRAINING UNIT".

ON PAGES 6-6 AND 6-7 CHANGE THE REFERENCE FSAR AMENDMENTS TO THE FOLLOWING:
PAGE 1.8-9 (AM. 26)
PAGES 1.8-10, 11, 12, AND 13 (AM. 27)

Basis

CORPORATE MANAGEMENT HAS CHANGED THE TITLE OF THIS POSITION. NEITHER THE PERSON HOLDING THE POSITION OR THE DUTIES OF THE POSITION HAVE CHANGED.
THE CHANGES TO THE FSAR AMENDMENT NUMBERS IS TO MAKE THE TECH SPECS CONSISTENT WITH THE LATEST FSAR CHANGES.

CP&L Comments

SHNPP Final Draft Technical Specifications

Record Number: 807

Comment Type: ERROR

LCO Number: 3.06.02.01

Page Number: 3/4 6-11

Section Number: 4.6.2.1.b

Comment:

CHANGE "2150" TO "1500"
CHANGE "DISCHARGE PRESSURE" TO "DIFFERENTIAL PRESSURE"
CHANGE "229" TO 170"

Basis

THE PREVIOUS VALUES WERE DETERMINED FOR FULL FLOW CONDITIONS. THIS REQUIRED SOME EXTRAPOLATION OF THE ACTUAL ANALYSIS ASSUMPTIONS ON REQUIRED FLOW TO DIFFERENT SYSTEM CONDITIONS. THE EXTRAPOLATION TO CONDITIONS OTHER THAN THOSE USED IN THE ACTUAL ANAYLSIS REQUIRED OVERLY CONSERVATIVE ASSUMPTIONS, RESULTING IN INAPPROPRIATE TESTING CRITERIA. THE VALUES PRESENTED HERE CORRECT THESE DIFFICULTIES BY PROVIDING ACCEPTANCE CRITERIA WHICH ARE MORE DIRECTLY TRACABLE TO THE ANALYTICAL ASSUMPTIONS. THE 1500 gpm INDICATED FLOW RATE IS THAT ASSUMED IN THE ANALYSIS (FSAR 6.5.2.3.2) AND THE DIFFERENTIAL PRESSURE REQUIREMENT IS CONSISTENT WITH FLOW TO THE CONTAINMENT SPRAY HEADERS IF THE CONTAINMENT ITSELF WERE AT 45 psig. THERE HAS BEEN NO CHANGE TO THE ANALYSIS NOR IN THE SYSTEM'S ABILITY TO MEET ITS REQUIREMENTS. THIS ERROR DEALS SOLELY WITH AN ASSUMPTION MADE BY CP&L IN AN ATTEMPT TO PERFORM THE TEST IN A MORE CONVENIENT SYSTEM CONFIGURATION.

Attachment 2 to NLS-86-377

Markup of TS pages
reflecting Final Draft Comments

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

CONTAINMENT SPRAY SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.2.1 Two independent Containment Spray Systems shall be OPERABLE with each Spray System capable of taking suction from the RWST and transferring suction to the containment sump.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one Containment Spray System inoperable, restore the inoperable Spray System to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours; restore the inoperable Spray System to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the following 30 hours. Refer also to Specification 3.6.2.3 Action.

SURVEILLANCE REQUIREMENTS

4.6.2.1 Each Containment Spray System shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position;

b. By verifying that, on an indicated differential pressure recirculation flow of at least 1500 ~~2150~~ gpm, each pump develops a ~~discharge pressure~~ of greater than or equal to ~~229~~ 190 psig when tested pursuant to Specification 4.0.5;

c. At least once per 18 months during shutdown, by:

1. Verifying that each automatic valve in the flow path actuates to its correct position on a containment spray actuation test signal and

2. Verifying that each spray pump starts automatically on a containment spray actuation test signal.

3. Verifying that, coincident with an indication of containment spray pump running, each automatic valve from the sump and RWST actuates to its appropriate position following an RWST Lo-Lo test signal.

d. At least once per 5 years by performing an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed.

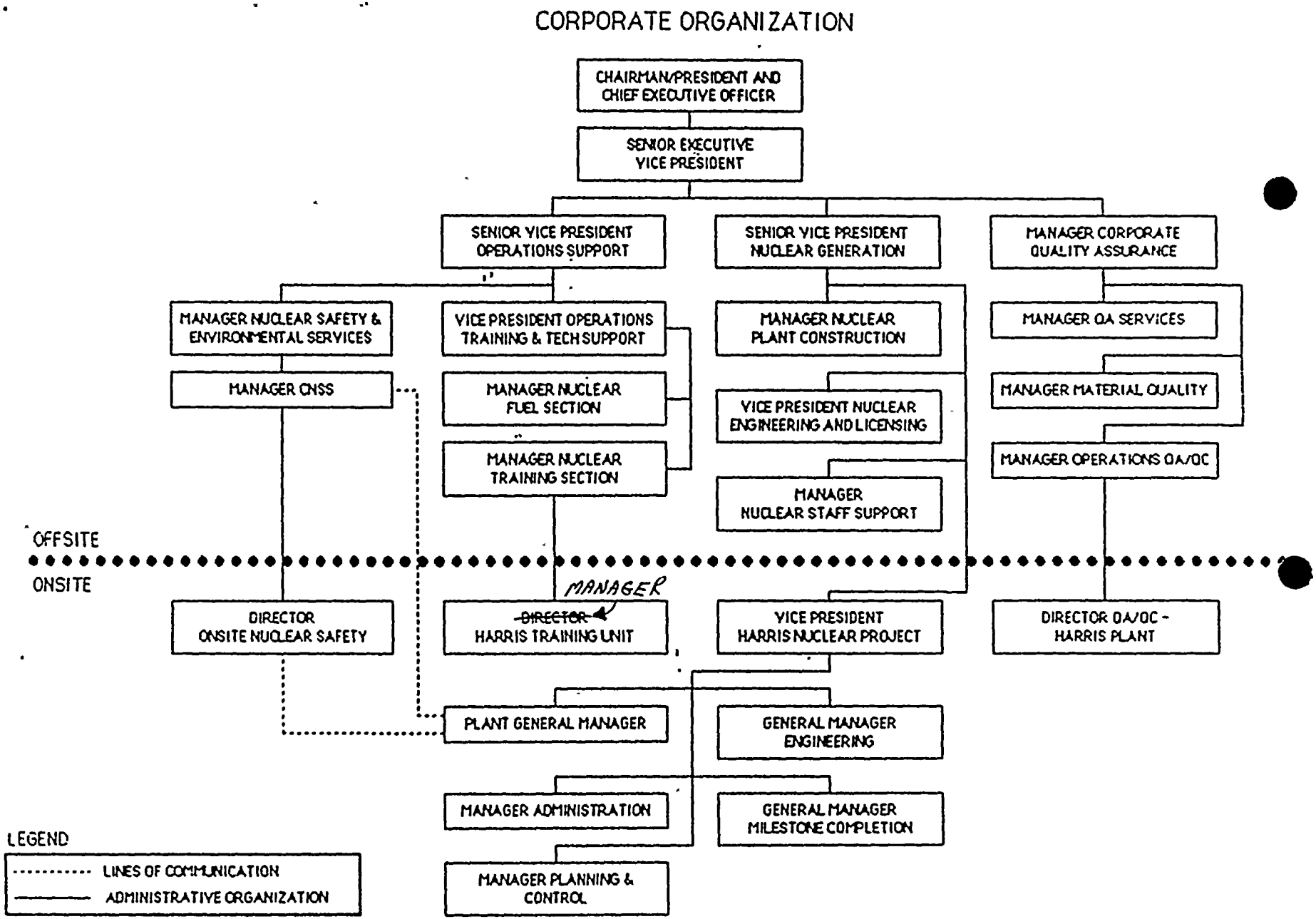

Figure 6.2-1

CORPORATE ORGANIZATION

6.2.3 ONSITE NUCLEAR SAFETY (ONS) UNIT

FUNCTION

6.2.3.1 The ONS Unit shall function to examine unit operating characteristics, NRC issuances, industry advisories, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ONS Unit shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety, to appropriate levels of management, up to and including the Senior Vice President-Operations Support, if necessary.

COMPOSITION

6.2.3.2 The ONS Unit shall be composed of at least five, dedicated, full-time engineers located on site. Each shall have a baccalaureate degree in engineering or related science and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

RESPONSIBILITIES

6.2.3.3 The ONS Unit shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

RECORDS

6.2.3.4 Records of activities performed by the ONS Unit shall be prepared, maintained, and forwarded each calendar month to the Manager-Nuclear Safety and Environmental Services.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Foreman in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a baccalaureate degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of the September 1979 draft of ANS 3.1, with the exceptions and alternatives noted on FSAR pages 1.8-8 (Am.20), 1.8-9 (Am.~~17~~ 21), 1.8-10 (Am.~~22~~ 27),

*Not responsible for sign-off function.

UNIT STAFF QUALIFICATIONS (Continued)

1.8-11 (Am.~~20~~ 27), 1.8-12 (Am.~~22~~ 27), and 1.8-13 (Am.~~27~~ 27), for comparable positions, except for the Manager-Environmental and Radiation Control who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The licensed Operators and Senior Operators shall also meet or exceed the minimum qualifications of the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980, NRC letter to all licensees.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the ~~Director~~ MANAGER-Harris Training Unit and shall meet or exceed the requirements and recommendations of the September 1979 draft of ANS 3.1, with the exceptions and alternatives noted on FSAR pages 1.8-8 (Am.20), 1.8-9 (Am.~~26~~ 27), 1.8-10 (Am.~~22~~ 27), 1.8-11 (Am.~~20~~ 27), 1.8-12 (Am.~~22~~ 27), and 1.8-13 (Am.~~27~~ 27), and Appendix A of 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 SAFETY AND TECHNICAL REVIEWS

6.5.1.1 General Program Control

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

a. All procedures and programs required by 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.

6.5.1.2 Technical Evaluations

6.5.1.2.1 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.

6.5.1.2.2 Technical review personnel will be identified by the responsible Manager or his designee for a specific activity when the review process begins.

6.5.1.3 Qualified Safety Reviewers

6.5.1.3.1 The Plant General Manager shall designate those individuals who will be responsible for performing safety reviews described in Specification 6.5.1.4.