



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 18, 2019

Ms. Tanya M. Hamilton
Site Vice President
Shearon Harris Nuclear Power Plant
Mail Code NHP01
5413 Shearon Harris Road
New Hill, NC 27562-9300

SUBJECT: SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1 - ISSUANCE OF AMENDMENT NO. 173 REGARDING EMERGENCY PLAN EMERGENCY ACTION LEVEL SCHEME CHANGE (EPID L-2018-LLA-0216)

Dear Ms. Hamilton:

The U.S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 173 to Renewed Facility Operating License No. NPF-63 for the Shearon Harris Nuclear Power Plant, Unit 1. This amendment revises the Emergency Plan Emergency Action Level Scheme associated with the fission product barrier degradation Emergency Action Level thresholds, and the cold shutdown/refueling system malfunction Emergency Action Level thresholds in response to your application dated August 13, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18226A022), as supplemented by letter dated December 17, 2018 (ADAMS Accession No. ML18351A052).

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Martha Barillas, Project Manager
Plant Licensing Branch II-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-400

Enclosures:

1. Amendment No. 173 to NPF-63
2. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DUKE ENERGY PROGRESS, LLC

DOCKET NO. 50-400

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 173
Renewed License No. NPF-63

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Duke Energy Progress, LLC (the licensee), dated August 13, 2018, as supplemented by letter dated December 17, 2018, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, by Amendment No. 173, Renewed Facility Operating License No. NPF-63 is hereby amended to authorize revision to the Emergency Plan as set forth in the licensee's application dated August 13, 2018, as supplemented by letter dated December 17, 2018, and evaluated in the NRC staff's safety evaluation enclosed with this amendment.
3. This license amendment is effective as of the date of its issuance and shall be implemented within 180 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA Michele G. Evans for/

Ho K. Nieh, Director
Office of Nuclear Reactor Regulation

Date of Issuance: July 18, 2019



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 173

TO RENEWED FACILITY OPERATING LICENSE NO. NPF-63

DUKE ENERGY PROGRESS, LLC

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1

DOCKET NO. 50-400

1.0 INTRODUCTION

By application dated August 13, 2018 (Reference 1), as supplemented by letter dated December 17, 2018 (Reference 2), Duke Energy Progress, LLC (Duke Energy or the licensee), requested U.S. Nuclear Regulatory Commission (NRC or the Commission) approval to revise the emergency plan (EP) for the Shearon Harris Nuclear Power Plant, Unit 1 (Harris). Duke Energy proposes to revise the current Harris EP Emergency Action Level (EAL) Scheme. These changes are associated with the Fission Product Barrier Degradation EAL thresholds and the Cold Shutdown/Refueling System Malfunction EAL thresholds. The amendment revises the current Fission Product Barrier EAL scheme for the containment radiation monitors to correct identified deficiencies and bring the scheme into alignment with the approved EAL methodology of the Nuclear Energy Institute (NEI) document NEI 99-01 Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated November 21, 2012 (Reference 3). Revision 6 of NEI 99-01 was endorsed by the NRC in a letter dated March 28, 2013 (Reference 4).

The supplemental letter dated December 17, 2018, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on November 6, 2018 (83 FR 55571).

2.0 REGULATORY EVALUATION

The applicable regulations and guidance for the emergency plans are provided below.

2.1 Regulations

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.47, "Emergency plans," sets forth emergency plan requirements for nuclear power reactors. Section 50.47(b) of 10 CFR establishes the planning standards that the onsite and offsite emergency response plans must meet for NRC

staff to make a finding that there is reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Specifically, planning standard 10 CFR 50.47(b)(4) of this section states:

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Section 50.47(b)(4) of 10 CFR requires the use of a standard emergency classification and action level scheme, assuring that implementation methods are relatively consistent throughout the industry for a given reactor and containment design while simultaneously providing an opportunity for a licensee to modify its EAL scheme as necessary to address site-specific design considerations or preferences.

Section IV.B.1 of Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR Part 50, states, in part:

The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety. The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring. By June 20, 2012, for nuclear power reactor licensees, these action levels must include hostile action that may adversely affect the nuclear power plant.

Section IV.B.2 of Appendix E to 10 CFR Part 50 states, in part:

A licensee desiring to change its entire emergency action level scheme shall submit an application for an amendment to its license and receive NRC approval before implementing the change.

2.2 Guidance

The EAL development guidance was initially established in Generic Letter 79-50, "Emergency Plans Submittal Dates," dated October 10, 1979 (Reference 5). This guidance was subsequently revised in NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (NUREG-0654), November 1980 (Reference 6), which was endorsed by NRC Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," October 31, 1981 (Reference 7), as an approach acceptable to the NRC for the development of an EAL scheme.

As industry and regulatory experience was gained with the implementation and use of EAL schemes, the industry issued revised EAL scheme development guidance to reflect lessons learned, numerous of which have been provided to the NRC for review and endorsement as generic (i.e., non-plant-specific) EAL development guidance. Most recently, the industry

provided NEI 99-01, Revision 6, which the NRC staff endorsed by letter dated March 28, 2013, as acceptable generic (i.e., not plant-specific) EAL scheme development guidance.

Although the EAL development guidance contained in NEI 99-01, Revision 6, is generic and may not be entirely applicable for some non-passive, large light-water reactor designs, it bounds the most typical accident and event scenarios for which emergency response is necessary, in a format that allows for industry standardization and consistent regulatory oversight. Licensees may choose to develop site-specific EAL schemes using NEI 99-01, Revision 6, with appropriate site-specific alterations as applicable.

NRC Regulatory Issue Summary (RIS) 2003-18, including Supplements 1 and 2, "Use of NEI 99-01, 'Methodology for Development of Emergency Action Levels'" (Reference 8), also provides guidance for developing or changing a standard EAL scheme. In addition, this RIS and its supplements provide recommendations to assist licensees, consistent with Section IV.B of Appendix E to 10 CFR Part 50, in determining whether to seek prior NRC approval of deviations from the guidance.

In summary, the NRC staff considers NEI 99-01, Revision 6, an acceptable method to develop site-specific EALs that meet the requirements of Section IV.B of Appendix E to 10 CFR Part 50 and planning standard 10 CFR 50.47(b)(4), with the understanding that licensees may want to develop EALs that differ from the guidance document.

2.3 NRC Staff Review

In its application, as supplemented, Duke Energy proposes to revise the current Harris EAL scheme associated with the Fission Product Barrier EAL thresholds and the Cold Shutdown/Refueling System Malfunction EAL thresholds, along with revising the threshold values for containment radiation monitors to correct identified deficiencies and bring the site into alignment with the Fission Product Barrier EAL methodology in NEI 99-01, Revision 6. The licensee submitted the proposed EAL scheme, the technical basis containing an evaluation, and the rationale for each proposed EAL change in support of the NRC staff's review.

To assure that the proposed EAL scheme meets the requirements of Section IV.B.1 of Appendix E to 10 CFR Part 50 and 10 CFR 50.47(b)(4), the NRC staff reviewed the application, as supplemented, to verify consistency of the proposed EAL scheme with the guidance provided in NEI 99-01, Revision 6.

The NRC staff also verified that the instrumentation and setpoints derived for this proposed EAL scheme are consistent with the overall EAL scheme development guidance, address the site-specific implementation strategies provided, and are consistent with a standard EAL scheme.

Although the EALs must be site-specific, the NRC staff reviewed the proposed EALs for the following key characteristics of an effective EAL scheme to ensure consistency:

- Consistency, including standardization of intent, if not in actual wording (i.e., the EALs would lead to similar decisions under similar circumstances at different plants);
- Human factors engineering and user friendliness;
- Potential for emergency classification level upgrade only when there is an increasing threat to public health and safety;
- Ease of upgrading and downgrading the emergency classification level;

- Thoroughness in addressing issues regarding the completeness and accuracy of EALs consistent with Appendix 1 to NUREG-0654 (i.e., the EALs are unambiguous and are based on site-specific indicators);
- Technical completeness for each classification level;
- Logical progression in classification for multiple events, and
- The use of objective and observable values.

The NRC staff verified that the proposed EAL scheme uses objective and observable values; is worded in a manner that addresses human factors engineering and user-friendliness concerns, follows logical progressions for escalating events, and allows for event downgrading and upgrading based upon the potential risk to the public health and safety. The NRC staff verified that risk assessments were appropriately used to set the boundaries of the emergency classification levels and ensure that all EALs that trigger the declaration of an emergency classification are in the same range of relative risk. In addition, the NRC staff verified that the proposed EAL scheme is technically complete for each emergency classification level, accurate and consistent with EAL schemes implemented at similarly designed plants.

To aid in understanding the nomenclature used in this safety evaluation, the following conventions are used: the first letter signifies the EAL recognition category; the second letter signifies the emergency classification level, and the number is the applicable number from the site-specific EAL scheme.

- The scheme's generic information is organized by Recognition Category as follows:
 - C – Cold Shutdown / Refueling System Malfunction
 - F – Fission Product Barrier
- The emergency classification levels are:
 - U = Unusual Event
 - A = Alert
 - S = Site Area Emergency and
 - G = General Emergency

An EAL set refers to EALs within an EAL recognition category and subcategory that includes an escalation path for one or more classification levels. Not all EAL recognition categories require an EAL set.

3.0 TECHNICAL EVALUATION

3.1 Recognition Category 'C' – Cold Shutdown/Refueling System Malfunction

The current Harris EALs for CS1.3 and CG1.2 include containment high range radiation monitor (CHRRM) readings as an indication of core uncover. The current CHRRM readings (RM-1CR-3589SA or RM-1CR-3590SB) correspond to core uncover higher than those anticipated at the CHRRMs if core uncover were to occur. Additionally, due to their physical location, the CHRRMs are not ideal for monitoring loss of water shielding from the reactor cavity due to conditions leading up to core uncover. Duke Energy proposes to instead use Containment Ventilation Isolation (CVI) radiation monitors as an indication of core uncover because the CVI radiation monitors have improved sensitivity and the physical location of these monitors allow them to detect significant changes in the loss of water shielding from the reactor

cavity. Duke Energy states the proposed EAL threshold is within the range of the CVI radiation monitors operating design.

Duke Energy chose to modify these EALs by using a site-specific implementation method that uses site-specific instrumentation and setpoint values to allow the site to identify conditions indicative of core uncovering with the reactor vessel head removed. The NRC staff verified that the numbering, sequencing, formatting, logical progression, ease of upgrading/downgrading, instrumentation, and setpoints for these EALs are consistent with the overall EAL scheme development guidance and address the site-specific implementation strategies provided, and are, therefore, consistent with a standard EAL scheme, as required by planning standard 10 CFR 50.47(b)(4).

The NRC staff also verified that these EALs are worded in an unambiguous manner that addresses human factors engineering and user-friendliness concerns, are technically complete for each classification level, address issues regarding completeness and accuracy, and use objective and observable values based on site-specific indications.

Based on the above, the NRC staff concludes that the site-specific implementation method for these EALs is consistent with the key characteristics of an effective EAL scheme (identified in Section 2.3 above) and meets the requirements of planning standard 10 CFR 50.47(b)(4) and Section IV.B.1 of Appendix E to 10 CFR Part 50. Therefore, the NRC staff finds these EALs acceptable.

3.2 Recognition Category 'F' – Fission Product Barrier Matrix

3.2.1 Loss of Reactor Coolant System (RCS) Threshold

Consistent with NEI 99-01, Revision 6, the current Harris EAL threshold for determining loss of RCS is based on the expected radiation readings if there were an instantaneous release and dispersal of the reactor coolant noble gas and iodine inventory into containment with reactor coolant activity equal to technical specification limits. Duke Energy states that the current Harris loss of RCS threshold includes a condition that is based on a noble gas monitor (REM-1LT-3502A-SA) providing an indication that the RCS is instantly released into the containment. However, the design of this noble gas radiation monitor does not support operation during an instantaneous loss of all RCS inventory since the inlet to this radiation monitor contains an isolation valve designed to close on safety injection (SI) isolation. Duke Energy states the current threshold does not adversely impact EAL declaration since a SI signal would alert decision makers at Harris of an RCS loss. The current threshold value would lead to an ALERT declaration without fuel clad or containment impacted.

Duke Energy proposes to use the CVI radiation monitors for declaring a loss of RCS barrier, as these monitors continuously monitor containment radiation levels and will continue to do so in the event of a SI initiation. Additionally, Duke Energy proposes to use time dependent threshold values consistent with a loss of all RCS inventory assuming the reactor coolant activity equals technical specification-allowable values, to enhance the overall accuracy of the scheme. The proposed EAL threshold is within the CVI radiation monitor's design operating range.

Duke Energy chose to modify this EAL by using a site-specific implementation method that uses site-specific instrumentation and setpoint values to allow the site to identify conditions indicative of a loss of the RCS barrier. The NRC staff verified that the numbering, sequencing, formatting, logical progression, ease of upgrading/downgrading, instrumentation, and setpoints for this EAL are consistent with the overall EAL scheme development guidance and address the site-specific

implementation strategies provided, and are, therefore, consistent with a standard EAL scheme, as required by planning standard 10 CFR 50.47(b)(4). The NRC staff also verified that the EAL is worded in an unambiguous manner that addresses human factors engineering and user-friendliness concerns, is technically complete for each classification level, addresses issues regarding completeness and accuracy, and uses objective and observable values based on site-specific indications.

3.2.2 Loss of Fuel Clad and Containment Thresholds

The current licensing basis for the Harris EAL scheme is based on NEI 99-01, Revision 6, as approved by the NRC in a letter dated April 13, 2016 (Reference 9). Previously, the EAL scheme transitioned from a NUREG-0654 based scheme to an NEI 99-01, Revision 5, based scheme following NRC approval on April 25, 2010 (Reference 10). The CHRRM thresholds contained within the current EAL scheme are based upon calculation methodologies used a NUREG-0654 based scheme instead of NEI 99-01, Revision 6, EAL scheme guidance. Duke Energy proposes changing the CHRRM threshold values for Fuel Clad and Containment barriers to values developed in accordance with the methodology described in NEI 99-01, Revision 6, to correct this condition. Additionally, Duke Energy proposes to use time dependent threshold values to enhance the overall accuracy of the scheme.

Duke Energy chose to modify this EAL by using a site-specific implementation method that uses site-specific instrumentation and setpoint values to allow the site to identify conditions indicative of a loss of the Fuel Clad and Containment barriers. The NRC staff verified that the numbering, sequencing, formatting, logical progression, ease of upgrading/downgrading, instrumentation and setpoints for this EAL set are consistent with the overall EAL scheme development guidance and address the site-specific implementation strategies provided, and are, therefore, consistent with a standard EAL scheme, as required by planning standard 10 CFR 50.47(b)(4). The NRC staff also verified that the EAL set is worded in an unambiguous manner that addresses human factors engineering and user-friendliness concerns, is technically complete for each classification level, addresses issues regarding completeness and accuracy of NEI 99-01, Revision 6, and uses objective and observable values based on site-specific indications.

Based on the above, the NRC staff concludes that the site-specific implementation method for the proposed changes to the fission product barriers is consistent with the key characteristics of an effective EAL scheme (identified in Section 2.3 above) and meets the requirements of planning standard 10 CFR 50.47(b)(4) and Section IV.B.1 of Appendix E to 10 CFR Part 50. Therefore, the NRC staff finds this EAL set modification acceptable.

3.3 Review Summary

The NRC staff has reviewed the technical bases for the proposed EAL revisions and the licensee's evaluation of the proposed changes. The changes are associated with the Cold Shutdown/Refueling System Malfunction EAL thresholds and the Fission Product Barrier Degradation EAL thresholds. The NRC staff verified that these modifications do not alter the intent of any specific EAL within a set, recognition category, or within the entire EAL scheme, as described in NEI 99-01, Revision 6. Thus, the proposed changes meet the requirements in planning standard 10 CFR 50.47(b)(4) and Section IV.B.1 of Appendix E to 10 CFR Part 50.

The NRC staff determined that the proposed EAL scheme uses objective and observable values, is worded in a manner that addresses human factors engineering and user-friendliness concerns, follows logical progressions for escalating events, and allows for event downgrading

and upgrading based upon the potential risk to the public health and safety. Risk assessments were appropriately used to set the boundaries of the emergency classification levels and ensure that all EALs that trigger an emergency classification are in the same range of relative risk. In addition, the NRC staff determined that the proposed EAL scheme is technically complete and consistent with EAL schemes implemented at similarly designed plants.

The NRC staff verified that the instrumentation and setpoints derived for the proposed EAL scheme are consistent with the overall EAL scheme development guidance, address the site-specific implementation strategies provided, and are consistent with a standard EAL scheme.

Based on its review, the NRC staff finds that the licensee's proposed EAL scheme is acceptable and provides reasonable assurance that the licensee can and will take adequate protective measures in the event of a radiological emergency. Specifically, the staff concludes that the licensee's proposed EAL scheme and site-specific EAL technical basis document provided by letter dated August 18, 2018, as supplemented, is acceptable for implementation.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of North Carolina official was notified of the proposed issuance of the amendment on April 26, 2019. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding published in the *Federal Register* on November 6, 2018 (83 FR 55571). Accordingly, the 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 need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

1. Letter from Duke Energy Progress, LLC, to U.S. Nuclear Regulatory Commission, "License Amendment Request to Change Shearon Harris Nuclear Power Plant, Unit 1, Emergency Plan Emergency Action Level Scheme," dated August 18, 2018

(Agencywide Documents Access and Management System (ADAMS) Accession No. ML18226A022).

2. Letter from Duke Energy Progress, LLC, to U.S. Nuclear Regulatory Commission, "Shearon Harris Nuclear Power Plant, Unit 1 - Response to Request for Additional Information Regarding License Amendment Request for Emergency Action Level Scheme Change," dated December 17, 2018 (ADAMS Accession No. ML18351A052).
3. NEI 99-01, Revision 6, "Development of Emergency Action Levels for Non-Passive Reactors," dated November 21, 2012 (ADAMS Package Accession No. ML13091A209).
4. U.S. Nuclear Regulatory Commission, letter to Ms. Susan Perkins-Grew, Nuclear Energy Institute, "U.S. Nuclear Regulatory Commission Review and Endorsement of NEI 99-01, Revision 6, dated November 2012 (TAC No. D92368)," dated March 28, 2013 (ADAMS Accession No. ML12346A463).
5. U.S. Nuclear Regulatory Commission, Generic Letter 79-50, "Emergency Plans Submittal Dates," dated October 10, 1979 (ADAMS Accession No. ML031320278).
6. U.S. Nuclear Regulatory Commission and Federal Emergency Management Agency, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG-0654/FEMA-REP-1, Revision 1, dated November 1980 (ADAMS Accession No. ML040420012).
7. U.S. Nuclear Regulatory Commission, "Emergency Planning and Preparedness for Nuclear Power Reactors," Regulatory Guide 1.101, Revision 2, October 31, 1981 (ADAMS Accession No. ML090440294), Revision 3, August 31, 1992 (ADAMS Accession No. ML003740302), and Revision 4, dated July 31, 2003 (ADAMS Accession No. ML032020276).
8. U.S. Nuclear Regulatory Commission, Regulatory Issue Summary 2003-18, "Use of NEI-99-01, 'Methodology for Development of Emergency Action Levels,' Revision 4, dated January 2003," dated October 8, 2003, including Supplement 1 dated July 13, 2004, and Supplement 2 dated December 12, 2005 (ADAMS Accession Nos. ML032580518, ML041550395, and ML051450482, respectively).
9. Letter from U.S. Nuclear Regulatory Commission to Duke Energy, "Shearon Harris Nuclear Power Plant Unit 1 - Issuance of Amendment to Adopt Emergency Action Level Scheme Pursuant to NEI 99-01, Revision 6, 'Development of Emergency Action Levels for Non-Passive Reactors,'" dated April 13, 2016 (ADAMS Accession No. ML16057A838).
10. Letter from U.S. Nuclear Regulatory Commission to Carolina Power & Light Company, Shearon Harris Nuclear Power Plant, Unit 1- Changes to Emergency Action Level Scheme, dated April 25, 2010 (ADAMS Accession No. ML100610685).

Principal Contributor: Raymond Hoffman, NSIR

Date: July 18, 2019

SUBJECT: SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1 - ISSUANCE OF AMENDMENT NO. 173 REGARDING EMERGENCY PLAN EMERGENCY ACTION LEVEL SCHEME CHANGE (EPID L-2018-LLA-0216) DATED JULY 18, 2019

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*by memorandum **by e-mail

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