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10 CFR 50.55a

June 10, 2022
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ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400/Renewed License No. NPF-63

Subject: Supplement to Relief Request HNP-IST-004-RR1 for Inservice Testing Program Plan – Fourth Ten-Year Interval

Ladies and Gentlemen:

By letter dated April 7, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22097A150), Duke Energy Progress, LLC (Duke Energy) submitted a relief request for the Shearon Harris Nuclear Power Plant, Unit 1 (HNP) seeking relief from the requirements of the 2004 Edition of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code), through the 2006 Addenda, specifically ISTC-3700, “Position Verification Testing.” ISTC-3700 requires valves with remote position indicators be observed at least once every two years to verify that valve operation is accurately indicated. In instances when local observation is not possible, other indications are to be used for verification of valve operation. The relief request submitted by Duke Energy proposes an alternative to the provisions of ISTC-3700 to allow utilization of the 10 CFR 50 Appendix J, Option B Local Leak Rate Test (LLRT) schedule for scheduling the ISTC-3700 position verification tests for select solenoid valves listed in the request.

This supplemental correspondence is to provide clarification related to the position verification testing for valves in the open position. The LLRT procedure EST-212, “Type C Local Leak Rate Tests,” in addition to confirming the closed indication of the valves, also confirms open indication by verifying an increase in the makeup flow on the Leak Rate Monitor (LRM), as local observation of solenoid movement is prohibited by valve design. This method satisfies the requirement for position indication verification and ensures that the indicating lights correspond to valve position. While there are other tests for monitoring operational readiness, as discussed further in Section 5.0 of the relief request, these tests do not provide for local observation of valve position nor the ability to verify obturator position by other supplemental indications. Instead, HNP uses the LRM per the LLRT procedure to verify remote position indication requirements. With the LLRT eligible to be performed on an Option B schedule, performance of the position verification for both open and closed indication is desired to be performed on this same Option B performance-based interval for the valves listed in the relief request. Performance of the ISTC-3700 indicator check on an Option B schedule provides an acceptable level of quality and safety, for those qualifying for local leakage rate testing on said schedule, in conjunction with the quarterly fail safe and stroke time testing.

This letter contains no new regulatory commitments. Please refer any questions regarding this submittal to Ryan Treadway, Manager – Nuclear Fleet Licensing, at 980-373-5873.

Sincerely,

Kim E. Maza
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Harris Nuclear Plant

cc: J. Zeiler, NRC Senior Resident Inspector, HNP
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