CP&L
A Progress Energy Company

**James Scarola**
Vice President
Harris Nuclear Plant

SERIAL: HNP-01-143
10CFR50.90

OCT 3 0 2001

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
APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS FOR POST ACCIDENT SYSTEMS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Dear Sir or Madam:

In accordance with the provisions of the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L) is submitting a request for an amendment to the Technical Specifications (TS) for the Harris Nuclear Plant (HNP). The proposed amendment revises TS concerning the Post Accident Sampling System (PASS) found in TS 6.8.4.

Specifically, HNP proposes to delete TS 6.8.4.e, "Post-Accident Sampling," and thereby eliminate the requirement to have and maintain the PASS at HNP. The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000 as part of the consolidated line item improvement process (CLIIP). As discussed in the notice of availability for this TS improvement, this request also revises TS 6.8.4.a, "Primary Coolant Sources Outside Containment," to clarify that the PASS remains subject to this program as long as it represents a potential source of primary coolant outside containment.

Enclosure 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific variations. Enclosure 2 provides page change instructions for incorporating the proposed revisions. Enclosure 3 provides the proposed Technical Specification pages.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of North Carolina with a copy of the proposed license amendment.

CP&L requests approval of the proposed License Amendment by January 31, 2002, with the amendment being implemented within 180 days of issuance. The approval date was administratively selected to allow for NRC review, but the plant does not require this amendment to allow continued safe full power operation.

A001

Rec'd on 01/14/02

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New Hill, NC 27562

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bcc: Ms. D. B. Alexander
Mr. G. E. Attarian
Mr. D. P. Baksa
Mr. L. Beller (BNP)
Mr. C. L. Burton
Mr. H. K. Chernoff (RNP)
Mr. W. F. Conway
Mr. G. W. Davis
Mr. F. M. Dean
Mr. R. J. Duncan II
Mr. J. H. Eads
Mr. R. J. Field
Mr. K. N. Harris
Ms. Terry Hardy (PE&RAS File)
Mr. C. S. Hinnant
Mr. H. L. James
Mr. M. T. Janus
Mr. F. A. Lane
Mr. R. D. Martin
Mr. M. D. McEarl
Mr. B. W. Morgan
Mr. T. C. Morton
Ms. A. L. Moss
Mr. R. H. Norville
Mr. T. Pilo
Mr. P. B. Summers
Mr. J. M. Taylor
Nuclear Records
Licensing File(s) (2 copies)

Please refer any questions regarding this submittal to Mr. J. Caves at (919) 362-3137.

Sincerely,

James Scarola

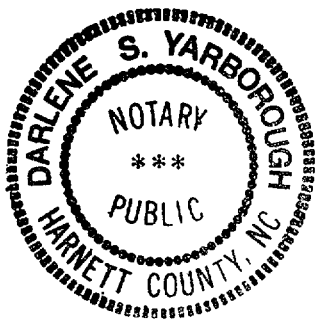
James Scarola

ONW/onw

James Scarola, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief, and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.

Darlene S. Yarborough
Notary (Seal)

My commission expires: 2-21-2005




Enclosures:
1. Description and Assessment
2. Page Change Instructions
3. Technical Specification Pages

c: Mr. J. B. Brady, NRC Sr. Resident Inspector
Mr. Mel Fry, Director, N.C. DENR
Mr. J. Goshen, NRC Project Manager
Mr. B. S. Mallett, NRC Regional Administrator (Acting)

bcc: Ms. D. B. Alexander
Mr. G. E. Attarian
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## DESCRIPTION AND ASSESSMENT

### DESCRIPTION

The proposed license amendment revises Technical Specification (TS) 6.8.4.a, "Primary Coolant Sources Outside Containment," and deletes TS 6.8.4.e, "Post-Accident Sampling," for the Harris Nuclear Plant (HNP). Specifically, the proposed change deletes the program requirements for the Post Accident Sampling System (PASS) as stipulated in TS 6.8.4.e. Since the PASS is also referenced in TS 6.8.4.a, a change is needed to make it clear that, pending a modification, the piping associated with the PASS may still represent a potential source of primary coolant leakage outside of containment. Therefore, the proposed change adds the following phrase to the reference to PASS in TS 6.8.4.a: "(until such time as a modification eliminates the Post-Accident Sample System as a potential leakage path)."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the Federal Register on October 31, 2000 as part of the consolidated line item improvement process (CLIIP).

Current Technical Specifications

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage, to as low as practical levels, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include:

4. Post-Accident Sample System

e. Post-Accident Sampling

A program that will ensure the capability to obtain and analyze, under accident conditions, reactor coolant, radioactive iodines and particulate 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.

Proposed Technical Specifications

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage, to as low as practical levels, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include:

4. Post-Accident Sample System (until such time as a modification eliminates the Post-Accident Sample System as a potential leakage path)

e. DELETED

ASSESSMENT

Applicability of Published Safety Evaluation

Carolina Power & Light Company (CP&L) has reviewed the safety evaluation published on October 31, 2000 as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Revision 2, "Post Accident Sampling System Requirements: A Technical Basis," submitted on October 27, 1998 and supplemented by letters dated April 28, 1999, April 10, 2000 and May 22, 2000). Carolina Power & Light Company has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to HNP and justify this amendment for the incorporation of the changes to the HNP TS.

Optional Changes and Variations

Carolina Power & Light Company is not proposing any variations or deviations from the TS changes described in TSTF-366 or the NRC staff's model safety evaluation published on October 31, 2000.

The HNP TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The PASS is specifically listed in TS 6.8.4.a as falling under the scope of this requirement. With the elimination of the PASS program, HNP may in the future, implement a modification to eliminate the PASS as a potential source of reactor coolant outside containment. However, this modification is not currently scheduled during the requested implementation period. Therefore, as described in the NRC staff's model safety evaluation published on October 31, 2000, CP&L is proposing to add the following phrase to the reference to PASS in TS 6.8.4.a: "(until such time as a modification eliminates the Post-Accident Sample System as a potential leakage path)." This phrase makes it clear that PASS is subject to the TS 6.8.4.a program as long as it represents a possible leakage path.

## REGULATORY ANALYSIS

### No Significant Hazards Determination

Carolina Power & Light Company has reviewed the proposed no significant hazards consideration determination published on October 31, 2000 as part of the CLIIP. Carolina Power & Light Company has concluded that the proposed determination presented in the notice is applicable to HNP and the determination is hereby incorporated by reference to satisfy the requirement of 10 CFR 50.91(a).

### Verifications and Commitments

As discussed in the notice of availability published in the Federal Register on October 31, 2000 for this TS improvement, plant-specific verifications and commitments are as follows:

1. Harris Nuclear Plant will develop contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in emergency plan implementing procedures, and will be implemented with the implementation of the license amendment. Establishment of contingency plans is considered a regulatory commitment.
2. Harris Nuclear Plant has established the capability for classifying fuel damage events at the Alert level threshold at radioactivity levels of 300 microCi/cc dose equivalent iodine. This capability is described in emergency plan implementing procedures. The capability for classifying fuel damage events is considered a regulatory commitment.
3. Harris Nuclear Plant has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in the HNP Emergency Plan and associated implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

## ENVIRONMENTAL EVALUATION

Carolina Power & Light Company has reviewed the environmental evaluation included in the model safety evaluation published on October 31, 2000 as part of the CLIIP. Carolina Power & Light Company has concluded that the NRC staff's findings presented in that evaluation are applicable to HNP and the evaluation is hereby incorporated by reference for this application.

ENCLOSURE 2 TO SERIAL: HNP-01-143

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PAGE CHANGE INSTRUCTIONS

| Removed Page | Inserted Page |
|---|---|
| 6-17 | 6-17 |
| 6-19 | 6-19 |

ENCLOSURE 3 TO SERIAL: HNP-01-143

SHEARON HARRIS NUCLEAR POWER PLANT
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TECHNICAL SPECIFICATION PAGES

PROCEDURES AND PROGRAMS (Continued)

g. Quality Assurance Program for effluent and environmental monitoring; and

h. Fire protection program implementation.

i. Technical Specification Equipment List Program.

6.8.2 DELETED

6.8.3 DELETED

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage, to as low as practical levels, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. The systems include:

1. Residual Heat Removal System and Containment Spray System, except spray additive subsystem and RWST,

2. Safety Injection System, except boron injection recirculation subsystem and accumulator,

3. Portions of the Chemical and Volume Control System:

   a. Letdown subsystem, including demineralizers,
   b. Boron re-cycle holdup tanks, and
   c. Charging/safety injection pumps,

4. Post-Accident Sample System (until such time as a modification eliminates the Post-Accident Sample System as a potential leakage path),

PROCEDURES AND PROGRAMS (Continued)

c. Secondary Water Chemistry (Continued)

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. Backup Method for Determining Subcooling Margin

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. DELETED

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 intake and discharge channels, and the auxiliary reservoir channel. The program shall include the following:

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.

g. Turbine Rotor Inspection

A program to implement an ongoing inspection of the low pressure turbine rotor. The program shall be based upon:

1. Vendor recommendations for low pressure turbine rotor inspection intervals and procedural guidelines, and

2. Using vendor methodology to recalculate the inspection interval if cracking in the rotor is ever found.

PROCEDURES AND PROGRAMS (Continued)

g. Quality Assurance Program for effluent and environmental monitoring; and

h. Fire protection program implementation.

i. Technical Specification Equipment List Program.

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3. Portions of the Chemical and Volume Control System:

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4. Post-Accident Sample System,

Add

(until such time as a modification eliminates the Post-Accident Sample System as a potential leakage path)

Delete

PROCEDURES AND PROGRAMS (Continued)

c. Secondary Water Chemistry (Continued)

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. Backup Method for Determining Subcooling Margin

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Delete

Add

DELETED

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Add

Amendment No.