Progress Energy

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10 CFR 50.90

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

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324/License Nos. DPR-71 and DPR-62

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

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261 / License No. DPR-23

Crystal River Unit 3 Nuclear Generating Plant
Docket No. 50-302 / License No. DPR-72

Application For Technical Specifications Improvement To Eliminate Requirements To Provide Monthly Operating Reports And Occupational Radiation Exposure Reports (TSTF-369, Revision 1)

Ladies and Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), and Florida Power Corporation, now doing business as Progress Energy Florida, Inc. (PEF), request license amendments for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, the Shearon Harris Nuclear Power Plant (SHNPP), Unit No. 1 and the Crystal River Unit 3 Nuclear Generating Plant (CR3). PEC is the principal owner of HBRSEP, BSEP, and SHNPP. PEF is the principal owner of CR3.

The proposed amendments would delete the Technical Specifications (TS) requirements to submit Monthly Operating Reports (MOR) and Occupational Radiation Exposure Reports (ORER). The change is consistent with NRC-approved Revision 1 to Industry/Technical Specifications Task Force (TSTF) Standard Technical Specifications Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the Consolidated Line Item Improvement Process (CLIIP). Additionally, administrative changes necessary to support TSTF-369 are included;

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most notably, HBRSEP, Unit No. 2, TS 5.6.8.b which currently requires the licensee to submit steam generator tube inspection results in the next MOR. Since the MOR will no longer exist, HBRSEP, Unit No. 2, is requesting that the TS be changed to require the licensee to submit the inspection results to the NRC as a separate report within sixty (60) days of inspection completion. Mr. William Reckley, Division of Licensing Project Management, Office of Nuclear Reactor Regulation, concurred with inclusion of this change for HBRSEP, Unit No. 2.

Attachment 1 provides a description of the proposed changes and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed changes. Attachment 3 provides the typed proposed TS pages. Attachment 4 provides a list of regulatory commitments being made by PEC and PEF.

The proposed changes have been reviewed by the Plant Nuclear Safety Committee at each of the respective plants.

PEC and PEF request approval of the proposed license amendments by April 28, 2005, with the amendments being implemented within 60 days of approval.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the Florida, North Carolina, and South Carolina designated state officials.

If you should have any questions regarding this submittal, please contact Mr. Tony Groblewski at (919) 546-4579.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: Nov. 17, 2004 C S Hinnant

C. S. Hinnant
Senior Vice President and
Chief Nuclear Officer

CSH/kmh

Attachments:
1. Description and Assessment
2. Proposed Technical Specifications Changes (Mark-Up)
3. Proposed Technical Specifications Pages
4. List of Regulatory Commitments

cc: (with attachments):

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ATTACHMENT 1

Description and Assessment

1.0 INTRODUCTION

The proposed license amendments revise the Technical Specifications (TS) for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, the Shearon Harris Nuclear Power Plant (SHNPP), Unit No. 1 and Crystal River Unit 3 Nuclear Generating Plant (CR3). The changes are primarily associated with implementation of the NRC-approved Industry/Technical Specifications Task Force (TSTF) Standard Technical Specifications Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specifications improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the Consolidated Line Item Improvement Process (CLIIP). Other administrative changes made in this submittal directly support implementation of TSTF-369, Revision 1.

2.0 DESCRIPTION OF PROPOSED AMENDMENTS

The following table summarizes the TS changes proposed in this amendment request.

	Summary of Proposed Changes			
Plant	**Deletion of ORER per TSTF-369**	**Deletion of MOR per TSTF-369**	**Deletion of PORV / Safety Valve Documentation per TSTF-369 and TSTF-258**	**Administrative**
BSEP Units 1 and 2	TS 5.6.1 Deleted	TS 5.6.4 - Deleted	TS 5.6.4 - Deleted	N/A
CR3	TS 5.7.1.1.a - Deleted	TS 5.7.1.2 - Deleted	TS 5.7.1.2 - Deleted	N/A
SHNPP	TS 6.9.1.2.a - Deleted	TS 6.9.1.5 - Deleted	TS 6.9.1.2.c - Deleted per TSTF-258	Index page xix Existing TS 6.9.1.2.b renumbered to TS 6.9.1.2.a
HBRSEP	TS 5.6.1 - Deleted	TS 5.6.4 - Deleted	TS 5.6.4 - Deleted	TS 5.6.8.b revised to require submittal of steam generator tube inspection results with 60 days of the completion of the inspections.

As addressed in the safety evaluation (SE) published in the Notice of Availability for TSTF-369, Progress Energy Carolinas, Inc. (PEC) is proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls," for SHNPP. Specifically, TS 6.9.1.2.c includes a requirement to report all challenges to pressurizer PORVs or pressurizer safety valves. The NRC model safety evaluation addressed the removal of requirements to submit challenges to pressurizer PORVs and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). PEC is requesting to delete the reporting requirement of TS 6.9.1.2.c for SHNPP. The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067), and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

There is an additional request to amend HBRSEP, Unit No. 2, TS 5.6.8.b which currently requires the licensee to submit steam generator tube inspection results in the next MOR. Since the MOR will no longer exist, HBRSEP, Unit No. 2, is requesting that the TS be changed to require the licensee to submit the inspection results to the NRC as a separate report within sixty (60) days of inspection completion.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067), and as described within TSTF-258 and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and as described in TSTF-369, except for the request to modify the requirements of HBRSEP, Unit No. 2, TS 5.6.8.b. On the subject of steam generator inspection reports, TSTF-369 states:

1. Reports required by the licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used.

2. These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

While the TSTF acknowledges the existence of these reporting requirements, it does not reference a TS that requires the licensee to report inspection results in a document that will no longer be required (i.e., the MOR). HBRSEP, Unit No. 2, TS 5.6.8.b currently requires the licensee to submit steam generator tube inspection results in the next MOR. HBRSEP, Unit No. 2, is requesting a change to TS 5.6.8.b to require submittal to the NRC within sixty (60) days of inspection completion as a separate report.

5.0 TECHNICAL ANALYSIS

PEC and Progress Energy Florida, Inc. (PEF) have reviewed the safety evaluation (SE) and supporting information published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. PEC and PEF have concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to BSEP Unit Nos. 1&2, CR3, SHNPP, Unit No. 1, and HBRSEP, Unit No. 2, and justify this amendment for the incorporation of the changes to the respective PEC and PEF nuclear plants TS.

PEC has also concluded that there is justification for requesting that the HBRSEP, Unit No. 2, TS 5.6.8.b be modified to change the requirement for the licensee to submit the steam generator tube inspection results in the Monthly Operating Report (MOR) for the period after the final inspection is completed. Since the MOR will no longer exist, PEC is requesting that the TS be modified to require that the results of the steam generator tube inspection be submitted to the NRC by a separate report within sixty (60) days of inspection completion.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067), and as described within TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, PEC and PEF are making the following regulatory commitments:

1. PEC and PEF will continue to provide to the NRC, for each calendar month, the operating data that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report." This data will be submitted by the last day of the month following the end of each calendar quarter. This commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). To prevent any gaps in the monthly operating statistics and shutdown experience data provided to the NRC, data for all months will be provided using one or both methods (i.e., monthly operating reports and/or CDE).

2. None of the PEC or PEF sites have different reactor types or both operating and shutdown reactors. Therefore, no commitment is required with regard to ORER elimination.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

PEC and PEF have reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067), as part of the CLIIP. PEC and PEF have concluded that the proposed determination presented in the notice is applicable to all PEC and PEF nuclear plants and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

PEC and PEF have reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. PEC and PEF have concluded that the Staff's findings presented in that evaluation are applicable to all PEC and PEF nuclear plants and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. PEC and PEF are not proposing variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258, or the NRC Staff's model SE published on June 23, 2004 (69 FR 35067).

10.0 REFERENCES

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATIONS CHANGES (MARK-UP)

The following table contains a list of affected TS pages for each licensee.

BSEP, Unit Nos. 1&2	5.0-18, 5.0-19
CR3	5.0-27, 5.0-28
SHNPP, Unit No. 1	xix, 6-20, 6-21, 6-23
HBRSEP, Unit No. 2	5.0-26, 5.0-27, 5.0-32

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

NOT USED

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and their associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), electronic dosimeter or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report, covering the previous calendar year, shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

NOT USED

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

Not USED

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and their associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), electronic dosimeter or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report, covering the previous calendar year, shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

NOTE

A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Not USED

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the main steam safety/relief valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

5.7.1 Routine Reports

5.7.1.1 Reports required on an annual basis include:

a. Occupational Radiation Exposure Report

Not Used

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was required, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescence dosimeter (TLD), or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions.

The report required by 10 CFR 20.2206(b) covering the preceding year shall be filed on or before April 30 of each year.

b. Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM).

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5.7 Reporting Requirements

5.7.1.1 b. Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.7.1.1 c. Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted prior to May 1 of each year, and in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program, and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV B.1.

5.7.1.2 ~~Monthly Operating Reports~~

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

NOT USED

5.7.2 Special Reports

Special Reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

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SECTION PAGE

DELETED

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC in accordance with 10CFR50.4.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS

6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions* (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or

*This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

ANNUAL REPORTS (Continued)

film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions;

b. The results of specific activity analyses in which the reactor coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) cleanup flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) graph of the I-131 concentration (μCi/gm) and one other radioiodine isotope concentration (μCi/gm) as a function of time for the duration of the specific activity above the steady-state level; and (5) the time duration when the specific activity of the reactor coolant exceeded the radioiodine limit.

c. Documentation of all challenges to the pressurizer power-operated relief valves (PORVs) and safety valves.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.3 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

~~MONTHLY OPERATING REPORTS~~ NOT USED

~~6.9.1.5 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.~~

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

NOT USED

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving an annual deep dose equivalent > 100 mrem/yr and their associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, maintenance, waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979.

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5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

NOT USED

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Shutdown Margin (SDM) for Specification 3.1.1;

2. Moderator Temperature Coefficient limits for Specification 3.1.3;

3. Shutdown Bank Insertion Limits for Specification 3.1.5;

(continued)

5.6 Reporting Requirements (continued)

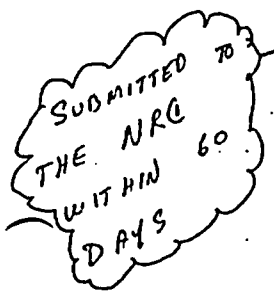
5.6.7 Tendon Surveillance Report

a. Notification of a pending sample tendon test, along with detailed acceptance criteria, shall be submitted to the NRC at least two months prior to the actual test.

b. A report containing the sample tendon test evaluation shall be submitted to the NRC within six months of conducting the test.

5.6.8 Steam Generator Tube Inspection Report

a. A report of the number of tubes plugged in each steam generator shall be submitted to the NRC within 14 days after completion of the tube plugging.



b. A report of the results of the steam generator tube inspection shall be ~~included in the Monthly Operating Report for the period beginning~~ after the final inspection is completed.

Reports shall include:

1. Number and extent of tubes inspected
2. Location and percent of wall thickness penetration for each eddy current indication and any leaks.
3. Identification of tubes plugged.

c. A report of examination results falling in Category C-3 of Table 5.5-1 shall be submitted to the NRC within 30 days, and prior to resumption of plant operation.

A report of investigations conducted to determine cause(s) of the tube degradation and corrective measures taken to prevent recurrence shall be submitted within 90 days following completion of the startup test program.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATIONS PAGES

The following table contains a list of affected TS pages for each licensee.

BSEP, Unit Nos. 1&2	5.0-18, 5.0-19
CR3	5.0-27, 5.0-28
SHNPP, Unit No. 1	xix, 6-20, 6-21, 6-23
HBRSEP, Unit No. 2	5.0-26, 5.0-27, 5.0-32

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used

5.6.2 Annual Radiological Environmental Operating Report

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

---NOTE---
A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Not Used

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Not Used

5.6.2 Annual Radiological Environmental Operating Report

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

---------- NOTE ----------
A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station.

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and the Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Not Used

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.7 Reporting Requirements

5.7.1 Routine Reports

5.7.1.1 Reports required on an annual basis include:

a. Not Used

b. Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM).

(continued)

5.7 Reporting Requirements

5.7.1.1 b. Annual Radiological Environmental Operating Report (continued)

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.7.1.1 c. Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted prior to May 1 of each year, and in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program, and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV B.1.

5.7.1.2 Not Used

5.7.2 Special Reports

Special Reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC in accordance with 10CFR50.4.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS

6.9.1.2 Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

Reports required on an annual basis shall include:

ANNUAL REPORTS (Continued)

a. The results of specific activity analyses in which the reactor coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) cleanup flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) graph of the I-131 concentration (μCi/gm) and one other radio-iodine isotope concentration (μCi/gm) as a function of time for the duration of the specific activity above the steady-state level; and (5) the time duration when the specific activity of the reactor coolant exceeded the radioiodine limit.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.3 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

6.9.1.5 Deleted

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 DELETED

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of Table 3 in the Radiological Assessment Branch Technical Position, Revision 1, November 1979.

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 DELETED

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

   1. Shutdown Margin (SDM) for Specification 3.1.1;

   2. Moderator Temperature Coefficient limits for Specification 3.1.3;

   3. Shutdown Bank Insertion Limits for Specification 3.1.5;

(continued)

5.6 Reporting Requirements (continued)

5.6.7 Tendon Surveillance Report

a. Notification of a pending sample tendon test, along with detailed acceptance criteria, shall be submitted to the NRC at least two months prior to the actual test.

b. A report containing the sample tendon test evaluation shall be submitted to the NRC within six months of conducting the test.

5.6.8 Steam Generator Tube Inspection Report

a. A report of the number of tubes plugged in each steam generator shall be submitted to the NRC within 14 days after completion of the tube plugging.

b. A report of the results of the steam generator tube inspection shall be submitted to the NRC within 60 days after completion of the final inspection.

Reports shall include:

1. Number and extent of tubes inspected
2. Location and percent of wall thickness penetration for each eddy current indication and any leaks.
3. Identification of tubes plugged.

c. A report of examination results falling in Category C-3 of Table 5.5-1 shall be submitted to the NRC within 30 days, and prior to resumption of plant operation.

A report of investigations conducted to determine cause(s) of the tube degradation and corrective measures taken to prevent recurrence shall be submitted within 90 days following completion of the startup test program.

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

Sheet 1 of 2

The following table identifies those actions committed to by Carolina Power and Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC) – Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2 in this document. Any other statements in this submittal, other than the commitments in this attachment, are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding this commitment to Mr. Leonard Beller at (910) 457-2073.

REGULATORY COMMITMENT	DUE DATE
BSEP will continue to provide to the NRC, for each calendar month, the operating data that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report." This data will be submitted by the last day of the month following the end of each calendar quarter. This commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). To prevent any gaps in the monthly operating statistics and shutdown experience data provided to the NRC, data for all months will be provided using one or both methods (i.e., monthly operating reports and/or CDE).	Upon implementation of the approved amendment.

The following table identifies those actions committed to by PEC – Shearon Harris Nuclear Power Plant (SHNPP), Unit No. 1. Any other statements in this submittal, other than the commitments in this attachment, are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding this commitment to Mr. David Corlett at (919) 362-3137.

REGULATORY COMMITMENT	DUE DATE
SHNPP will continue to provide to the NRC, for each calendar month, the operating data that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report." This data will be submitted by the last day of the month following the end of each calendar quarter. This commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). To prevent any gaps in the monthly operating statistics and shutdown experience data provided to the NRC, data for all months will be provided using one or both methods (i.e., monthly operating reports and/or CDE).	Upon implementation of the approved amendment.

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

Sheet 2 of 2

The following table identifies those actions committed to by PEC – H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. Any other statements in this submittal, other than the commitments in this attachment, are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding this commitment to Mr. Charles Baucom at (843) 857-1253.

REGULATORY COMMITMENT	DUE DATE
HBRSEP will continue to provide to the NRC, for each calendar month, the operating data that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report." This data will be submitted by the last day of the month following the end of each calendar quarter. This commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). To prevent any gaps in the monthly operating statistics and shutdown experience data provided to the NRC, data for all months will be provided using one or both methods (i.e., monthly operating reports and/or CDE).	Upon implementation of the approved amendment.

The following table identifies those actions committed to by Florida Power Corporation, now doing business as Progress Energy Florida, Inc. (PEF) - Crystal River Unit 3 (CR3) Nuclear Generating Plant. Any other statements in this submittal, other than the commitments in this attachment, are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding this commitment to Mr. Sidney Powell at (352) 563-4883.

REGULATORY COMMITMENT	DUE DATE
CR3 will continue to provide to the NRC, for each calendar month, the operating data that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report." This data will be submitted by the last day of the month following the end of each calendar quarter. This commitment is based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). To prevent any gaps in the monthly operating statistics and shutdown experience data provided to the NRC, data for all months will be provided using one or both methods (i.e., monthly operating reports and/or CDE).	Upon implementation of the approved amendment.