

June 5, 2012
Serial: HNP-12-069

10 CFR 50.90

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 Facility Operating License No. NPF-63

Subject: REQUEST FOR LICENSE AMENDMENT
MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE
COMMENTS REGARDING AMENDMENT 139

References:

1. Letter from C. L. Burton to the U.S. NRC, "REQUEST FOR LICENSE AMENDMENT, MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE," Serial HNP-11-001 dated April 28, 2011, ADAMS Accession No. ML11124A180
2. Letter from C. L. Burton to the U.S. NRC, "REQUEST FOR LICENSE AMENDMENT, MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE REQUEST FOR ADDITIONAL INFORMATION RESPONSE RELATED TO REACTOR CORE SAFETY LIMITS," Serial HNP-12-044 dated March 26, 2012, ADAMS Accession No. ML12100A160
3. Letter from A. T. Billoch Colón to C. L. Burton, "SHEARON HARRIS NUCLEAR POWER PLANT, UNIT 1 – ISSUANCE OF AMENDMENT RE: MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE," dated May 30, 2012, ADAMS Accession No. ML11356A096

Ladies and Gentlemen:

During the Shearon Harris Nuclear Power Plant, Unit 1 (HNP) implementation review of the Measurement Uncertainty Recapture Power Uprate Amendment, Reference 3, we discovered two discrepancies related to the Reactor Core Safety Limits discussion and Technical Specification (TS) Figure 2.1-1. Both are the result of errors by the Harris organization in the original License Amendment Request (LAR, Reference 1) or supplements.

Reference 3, Safety Evaluation, page 67, Table 6 *Technical Specification Figure 2.1-1*, incorrectly correlates the highest pressure data set to a value of 2375 psig. The correct pressure for that data set is 2385 psig.

TS Figure 2.1-1, *Reactor Core Safety Limits*, contains curves of T_{avg} (RCS average temperature) versus Power at pressures of 2385, 2235, and 1960 psig. The data breakpoints corresponding to the curves were correctly provided in Reference 1, Enclosure 1, on page 4 of 18. A request for additional information (RAI) asked that we provide the current and proposed (post-uprate) breakpoints for the three Reactor Core Safety Limit curves. The RAI response, Reference 2, incorrectly identified the pressure corresponding to the upper curve as 2375 instead of 2385 due to a data transcription error from the calculation to the RAI response. The incorrect information was then carried forward from the RAI response to the Safety Evaluation (page 67, Table 6, *Technical Specification Figure 2.1-1*) resulting in correlating the upper curve of Figure 2.1-1, labeled 2385, to a data set incorrectly labeled 2375 psig. The three Reactor Core Safety Limit curves of Technical Specification Figure 2.1-1, both prior and subsequent to Amendment 139, are correctly labeled 2385 psig, 2235 psig, and 1960 psig.

The impact is limited to the one number (2375) in Table 6, and does not affect the discussion of how the curves were developed in our LAR, its supplements, or the discussion in the Safety Evaluation. Please issue a revised page 67 to the Safety Evaluation, replacing 2375 with 2385 in Table 6, *Technical Specification Figure 2.1-1*, supported by the correct information in Reference 1.

A second error was discovered on the title of Technical Specification Figure 2.1-1 in Amendment 139. Figure 2.1-1, as issued, is titled *REACTOR CORE SAFETY LIMITS - THREE LOOPS IN OPERATION WITH MEASURED RCS FLOW $\geq [293,540 \text{ GPM} \times (1.0 + C_1)]$* . It should be ">" (greater than) instead of " \geq " (greater than or equal to).

The TS markup in the original LAR was correct, however the ">" sign was inadvertently changed to " \geq " in the retyped pages submitted in the LAR. This was caused by an administrative error when retyping the page to incorporate the changed figure (not intended to change the title). ">" is correctly cited in the discussion of Figure 2.1-1 in the LAR and the SE. Please issue a revised Technical Specification page 2-2, changing " \geq " to ">" in the title of Figure 2.1-1, supported by Reference 1, Enclosure, Attachment 1, *OPERATING LICENSE AND TECHNICAL SPECIFICATION PAGE MARKUPS*. The corrected retyped page is enclosed.

The undesired condition associated with the incorrect information provided to the NRC discussed above has been entered into the HNP Corrective Action Program. The HNP Senior Resident Inspector has been informed.

This document contains no regulatory commitments. Please refer any questions regarding this submittal to Dave Corlett at (919) 362-3137.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
[*JUNE 5, 2012*].

Sincerely,

Handwritten signature of Christopher L. Burton in cursive script.

CLB/jrc

Enclosure: Retyped Technical Specification Page 2-2

cc: Mr. J. D. Austin, NRC Sr. Resident Inspector, HNP
Ms. A. T. Billoch Colón, NRC Project Manager, HNP
Mr. W. L. Cox, III, Section Chief N.C. DENR
Mr. V. M. McCree, NRC Regional Administrator, Region II

HNP-12-069

Enclosure

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

REQUEST FOR LICENSE AMENDMENT
MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE
RETYPE TECHNICAL SPECIFICATION PAGE 2-2

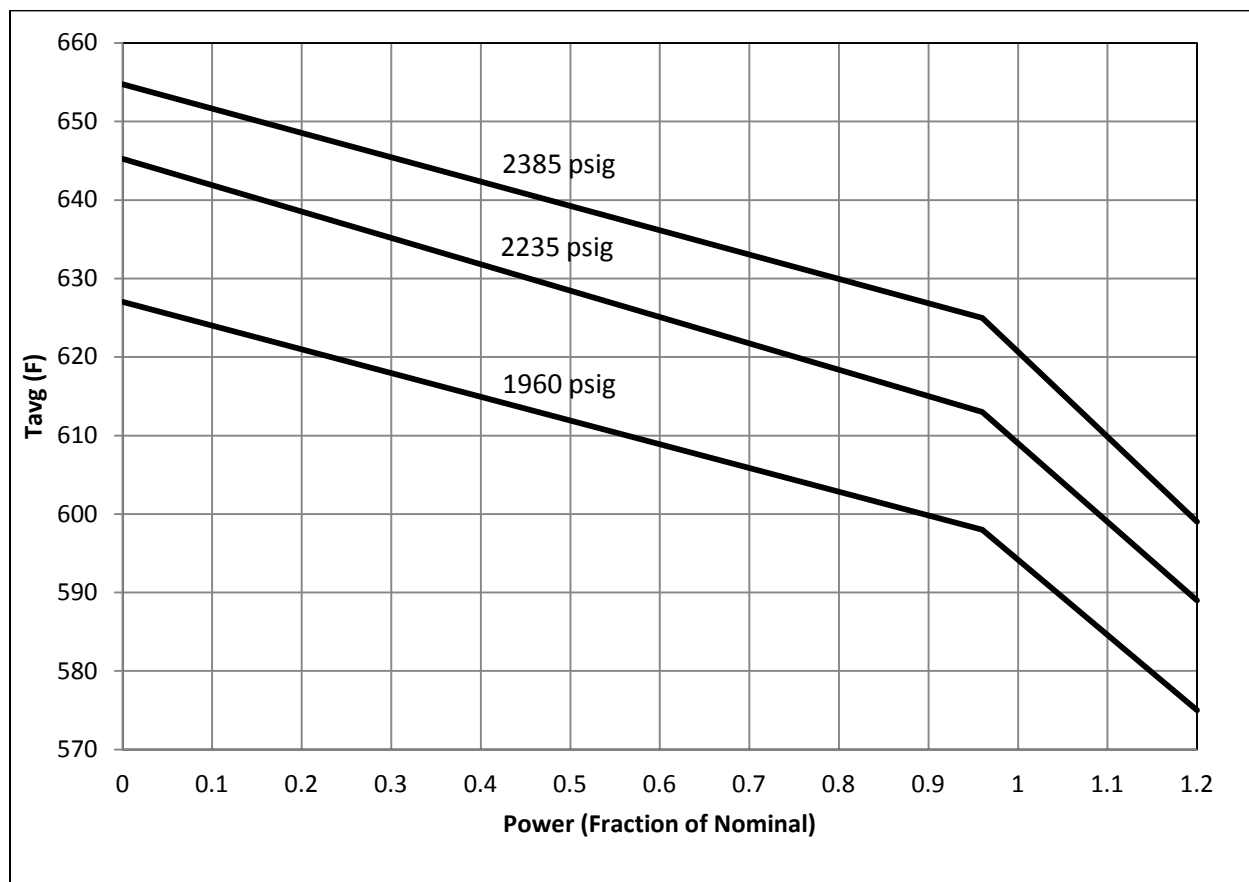


FIGURE 2.1-1
REACTOR CORE SAFETY LIMITS – THREE LOOPS IN OPERATION
WITH MEASURED RCS FLOW > [293,540 GPM X (1.0 + C₁)]