

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Informs that util proposes to fully implement guidance provided by GL 93-05 with regard to modifying TS 3/4.5.1 surveillance requirements. Encl 1 provides response to RAI. Encl 2 provides revised TS pages change instructions.

NOTES:Application for permit renewal filed. . 05000400

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Carolina Power & Light Company
PO Box 165
New Hill NC 27562

James Scarola
Vice President
Harris Nuclear Plant

SERIAL: HNP-98-147
10CFR50.90

OCT 15 1998

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
REQUEST FOR LICENSE AMENDMENT
TECHNICAL SPECIFICATION 3/4.5.1
SUPPLEMENTAL INFORMATION

Dear Sir or Madam:

By letters dated March 10, 1997 and May 23, 1997, Carolina Power & Light Company (CP&L) submitted a Request for License Amendment for the Harris Nuclear Plant (HNP). The proposed amendment revises Technical Specification 3/4.5.1, "Accumulators" and the associated Bases. Specifically, Harris Nuclear Plant (HNP) proposed to provide an optional method of meeting Surveillance Requirement (SR) 4.5.1.1.a.1 and modify the Action statement regarding when an Accumulator does not meet the Limiting Condition for Operation for boron concentration. By letter dated May 12, 1998, the NRC requested additional information regarding this submittal. The NRC states that it appears that the proposed change to SR 4.5.1.1.a.1 differs from the Standard Technical Specifications (STS) for Westinghouse Plants, NUREG-1431, Rev 1. Specifically, the proposed change to verify the borated water volume and nitrogen cover-pressure "by the absence of alarms or instrument readings," is not consistent with the STS. The NRC also referred to Generic Letter 93-05, "Line-Item Technical Specifications Improvements To Reduce Surveillance Requirements for Testing During Power Operations." Generic Letter 93-05 provides guidance for implementing changes to TS 3/4.5.1 surveillance requirements. //

In response to this request for additional information, HNP proposes to fully implement guidance provided by Generic Letter 93-05 with regard to modifying TS 3/4.5.1 surveillance requirements.

Enclosure 1 provides the response to the request for additional information. Enclosure 2 provides for revised TS page change instructions. Enclosure 3 provides revised TS pages. 700)

These changes do not affect the conclusions of either the 10 CFR 50.92 Evaluation or the Environmental Considerations submitted as part of CP&L's letter dated March 10, 1997. The proposed TS pages in this submittal supersede the proposed TS pages previously submitted by letters dated March 10, 1997 and May 23, 1997.

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Please refer any questions regarding this matter to Mr. J. H. Eads at (919) 362-2646.

Sincerely,

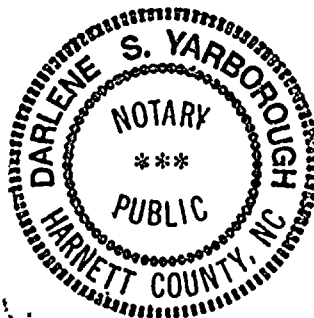
James Scarola

MSE/mse

Enclosures:

1. Response to Request for Additional Information
2. Revised TS Page Change Instructions
3. TS Pages

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: 2-6-2008

c: Mr. J. B. Brady, NRC Sr. Resident Inspector
Mr. Mel Fry, Acting Director, N.C. DEHNR
Mr. S. C. Flanders, NRC Project Manager
Mr. L. A. Reyes, NRC Regional Administrator

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NRC Question

The submittal states that the proposed changes to Technical Specifications (TS) 3.5.1 are identical with the equivalent requirements of the Standard Technical Specifications (STS) for Westinghouse Plants, NUREG-1431, Rev 1. However, it appears that the proposed change to Surveillance Requirement (SR) 4.5.1.1.a.1 differs from the STS. Specifically, your proposed change to verify the borated water volume and nitrogen cover-pressure "by the absence of alarms or instrument readings," is not consistent with the STS. Please clarify.

Further, the NRC staff completed a comprehensive examination of SRs in TS as part of the TS Improvement Plan (TSIP). The results of this effort were documented in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements." Removal of the requirement to verify the borated water volume and nitrogen cover-pressure "by the absence of alarms," was identified as a TS SR improvement. Guidance to assist licensees in preparing a license amendment to implement these recommendations as line-item TS improvements was included in Generic Letter 93-05, "Line-Item Technical Specifications Improvements To Reduce Surveillance Requirements for Testing During Power Operations."

Harris Nuclear Plant Response

In response to this request for additional information, HNP proposes to fully implement Generic Letter 93-05 with respect to TS 3/4.5.1. The following are the proposed changes to letters dated March 10, 1997 and May 23, 1997 with respect to TS 3/4.5.1.

Generic Letter (GL) 93-05 dated September 27, 1993, states:

"The NRC staff and industry effort to develop new STS recognized that accumulator instrumentation operability is not directly related to the capability of the accumulators to perform their safety function. Therefore, surveillance requirements for this instrumentation are being relocated from the new STS and the only surveillance that is being retained is that required to confirm that the parameters defining accumulator operability are within their specified limits".

Therefore, HNP proposes to modify TS 4.5.1.1.a.1, Emergency Core Cooling Systems (ECCS)-Accumulators, to state "Verifying that the contained borated water volume and nitrogen cover-pressure in the tanks are within their limits". Additionally, HNP proposes deleting TS 4.5.1.2.

The calibration requirements for accumulator instrumentation are contained in existing plant maintenance procedures. Changes to maintenance procedures are controlled in accordance with plant change control procedures, the requirements of the Administrative Controls section of the TS, and 10 CFR 50.59.

In addition, GL 93-05 states:

"It should not be necessary to verify boron concentration of accumulator inventory after a volume increase of 1% or more if the makeup water is from the RWST and the minimum concentration of boron in the RWST is greater than or equal to the

minimum boron concentration in the accumulator, the recent RWST sample was within specifications, and the RWST has not been diluted."

Therefore, HNP proposes revising TS 4.5.1.1.b to state "This surveillance is not required when the volume increase makeup source is the RWST and the RWST has not been diluted since verifying that the RWST boron concentration is equal to or greater than the accumulator boron concentration limit." The TS requirement for boron concentration in the RWST (2400ppm-2600ppm) is identical to the TS requirement for boron concentration in the accumulators. Therefore, if RWST boron concentration is within its TS requirements, then filling the accumulators from the RWST should not affect accumulator operability with respect to boron concentration.

The surveillance interval for verification of accumulator boron concentration, accumulator pressure, and accumulator level is not being modified by the proposed change. The elimination of surveillance requirements for accumulator instrumentation will not directly impact the ability of accumulators to perform their safety function. Additionally, accumulator sampling should not be required when the makeup source is the RWST. Therefore, this proposed change is compatible with plant operating experience with respect to ECCS Accumulators.

Generic Letter 93-05 provides guidance for preparing a license amendment request to change TS to reduce testing during power operation. These line-item TS improvements are based on the recommendations of an NRC study that included a comprehensive examination of surveillance requirements and is reported in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," December 1992. This proposed change is consistent with the guidance provided in GL 93-05 and NUREG-1431.

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REVISED PAGE CHANGE INSTRUCTIONS

<u>Removed Page</u>	<u>Inserted Page</u>
3/4 5-1	3/4 5-1
3/4 5-2	3/4 5-2
B3/4 5-1	B3/4 5-1
-----	B3/4 5-1a

ENCLOSURE 3 TO SERIAL: HNP-98-147

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TECHNICAL SPECIFICATION PAGES