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SCAROLA, J.	Carolina Power & Light Co.		
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SUBJECT: Application for amend to license NPF-63, revising TS 6.2.2.e to require either operations manager or off-shift operations superintendent to hold SRO license.

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

James Scarola
Vice President
Harris Nuclear Plant

AUG - 2 1999

SERIAL: HNP-99-082
10CFR50.90

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
REVISION TO TECHNICAL SPECIFICATION 6.2.2.e - OPERATIONS MANAGEMENT
LICENSE REQUIREMENTS

Dear Sir or Madam:

In accordance with the Code of Federal Regulations, Title 10, Part 50.90, Carolina Power & Light Company (CP&L) requests a revision to the Technical Specifications (TS) for the Harris Nuclear Plant (HNP). The proposed amendment revises the TS concerning Operations management license requirements. Specifically, HNP proposes to revise TS 6.2.2.e to require either the Operations Manager or an off-shift Operations superintendent to hold a senior reactor operator (SRO) license. This revision deletes the option which allows the Manager-Operations to have at one time held a Senior Reactor Operator License for a similar unit and replaces it with the requirement for an off-shift Operations superintendent who holds an SRO license to supervise shift work and licensed activities. This proposed revision continues to ensure adequate SRO licensed supervision for Operations and licensed activities.

This proposed TS change is needed to allow flexibility in filling Operations management positions while ensuring that Operations management maintains in-depth, plant-specific knowledge and preserves the requirement in 10 CFR 50.54(l).

Enclosure 1 provides a description of the proposed change and the basis for the change. Enclosure 2 details, in accordance with 10 CFR 50.91(a), the basis for the CP&L's determination that the proposed changes do not involve a significant hazards consideration. Enclosure 3 provides an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental assessment is required for approval of this amendment request. Enclosure 4 provides page change instructions for incorporating the proposed revisions. Enclosure 5 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.

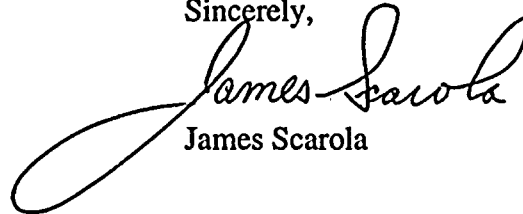
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CP&L requests that the proposed amendment be issued such that implementation will occur within 60 days of issuance to allow time for orderly incorporation into copies of the Technical Specifications.

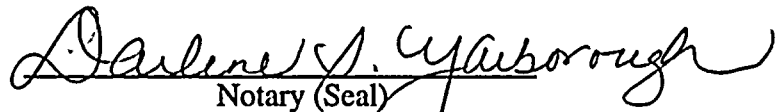
Please refer any questions regarding this submittal to Mr. J. H. Eads at (919) 362-2646.

Sincerely,


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.

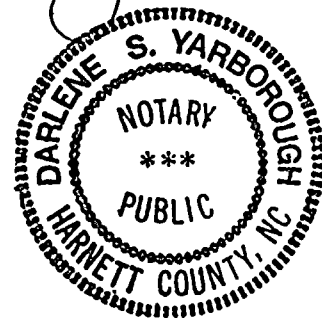

Notary (Seal)

My commission expires:

2-6-2008

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Environmental Considerations
4. Page Change Instructions
5. Technical Specification Page



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

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bcc: Ms. D. B. Alexander
Mr. G. E. Attarian
Mr. R. H. Bazemore
Mr. C. L. Burton
Mr. H. K. Chernoff (RNP)
Mr. B. H. Clark
Mr. W. F. Conway
Mr. G. W. Davis
Mr. W. J. Dorman (BNP)
Mr. R. J. Field
Mr. K. N. Harris
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Mr. M. Janus
Mr. G. J. Kline
Mr. Brett Kruse
Ms. W. C. Langston (PE&RAS File)
Mr. R. D. Martin
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SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
REVISION TO TECHNICAL SPECIFICATION 6.2.2.e – OPERATIONS MANAGEMENT
LICENSE REQUIREMENTS

BASIS FOR CHANGE REQUEST

BACKGROUND

On January 4, 1988, and as supplemented December 29, 1988 and January 16, 1989, Carolina Power & Light (CP&L) requested a revision to Technical Specification (TS) 6.2.2.e. The requested revision changed a requirement for the Manager-Operations to hold a Senior Reactor Operator (SRO) license to allow the Manager-Operations to either (1) hold an SRO license, or (2) have at one time held an SRO license on Harris or a similar plant. This revision was approved and issued as Operating License Amendment 9 on March 2, 1989. In the NRC's Evaluation and Safety Summary for Amendment 9, the staff's position with respect to license requirements for the Manager-Operations was that if the Manager-Operations does not hold an SRO license then a middle manager position, such as the Operations Supervisor, shall hold an SRO license. The Operations Supervisor position provided an additional level of supervision between the Manager-Operations and the Shift Foreman.

On June 12, 1997, and as supplemented by letter dated August 27, 1998, CP&L requested a revision to TS 6.2.2.e. TS 6.2.2.e required that the Manager-Operations either hold an SRO license or have at one time held an SRO license on Harris or a similar plant. If the Manager-Operations did not hold an SRO license, then the Operations Supervisor shall hold an SRO license. As a result of organizational changes, the Operations Supervisor position no longer existed. The requested revision changed the requirement from the Operations Supervisor to an off-shift Operations superintendent. This revision was approved and issued as Operating License Amendment 83 on October 7, 1998. In the NRC's Safety Evaluation for Amendment 83, the staff concluded that TS 6.2.2.e, requiring that either the Manager-Operations or an off-shift Operations superintendent hold an SRO license is consistent with the requirements of 10 CFR 50.54(l) and ensures that a licensed off-shift senior operator will direct the activities of the licensed operators. Further, the requirement that an Operations Middle Manager (Operations superintendent) hold an SRO license when the Manager-Operations does not hold an SRO license is consistent with the requirements of ANSI/ANS-3.1 (September 1979 Draft) and ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position.

PROPOSED CHANGE

Harris Nuclear Plant (HNP) proposes revising TS 6.2.2.e to modify the requirement for the Manager-Operations to hold an SRO license or have at one time held an SRO license for a similar unit by requiring either the Manager-Operations or an off-shift Operations superintendent to hold an SRO license. Specifically, the proposed TS change would delete the option in TS 6.2.2.e which allows the Manager-Operations to have at one time held a Senior Reactor Operator License for a similar unit and replaces it with the requirement for an off-shift Operations superintendent who holds an SRO license to supervise shift work and licensed activities. This allows additional flexibility in filling the Manager-Operations position while ensuring that a

licensed off-shift senior operator will direct the licensed activities of the licensed operators, and also ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position.

Current Requirement

Technical Specification 6.2.2.e states:

The Manager-Operations shall either hold a Senior Reactor Operator License or have at one time held a Senior Reactor Operator License for a similar unit. If the Manager-Operations does not hold a Senior Reactor Operator License, an off-shift Operations superintendent who reports directly to the Manager-Operations and holds a Senior Reactor Operator License shall be designated to supervise shift work and licensed activities.

Proposed Requirement

The proposed revision to Technical Specification 6.2.2.e states:

The Manager-Operations or an off-shift Operations superintendent shall hold a Senior Reactor Operator License. If the Manager-Operations does not hold a Senior Reactor Operator License, an off-shift Operations superintendent who reports directly to the Manager-Operations and holds a Senior Reactor Operator License shall be designated to supervise shift work and licensed activities.

BASIS FOR THE PROPOSED CHANGE

The proposed change requires either the Manager-Operations or an off-shift Operations superintendent to hold an SRO license. This is consistent with Revision 1 of NUREG-1431, "Standard Technical Specifications Westinghouse Plants," and Technical Specification Traveler Form (TSTF) 65, Revision 1, which was approved by the NRC on December 2, 1997. The current and proposed HNP TS include additional wording to clarify the responsibility of the off-shift Operations superintendent if the Manager-Operations does not hold an SRO license.

The Manager-Operations has the overall responsibility for management of planning, directing and coordinating operating activities in accordance with applicable regulations, policies and procedures. The direct supervision of shift work and licensed activities is the responsibility of the Manager-Operations, although this shall be delegated to an off-shift Operations superintendent if the Manager-Operations does not hold an SRO license. The Operations superintendent reports directly to the Manager-Operations and has the on-shift supervisors as direct reports. This change ensures that the position responsible for supervising shift work and licensed activities is in the direct chain-of-command of the Operations organization. The proposed change is consistent with 10 CFR 50.54(l), which requires individuals responsible for directing the licensed activities of licensed operators to hold an SRO license.

The Manager-Operations is a member of senior management at the Harris Nuclear Plant. Requiring the Manager-Operations or an off-shift Operations superintendent to hold an SRO license will ensure that operations management can effectively interface with the day-to-day operational aspects of control room activities and can communicate operational issues to higher levels of plant and utility management. This change is consistent with the intent of ANSI/ANS-3.1, "Standard for Selection and Training of Personnel for Nuclear Power Plants," (September

- 1979 Draft) and ensures there is site specific detailed relevant technical and systems knowledge in a senior operations management position.

In summary, the proposed change to Technical Specification 6.2.2.e, requiring the Manager-Operations or an off-shift Operations superintendent to hold an SRO license is consistent with (1) 10 CFR 50.54(l), which requires individuals responsible for directing the licensed activities of licensed operators to hold an SRO license, (2) the Improved Standard Technical Specifications as contained in Revision 1 of NUREG-1431 and TSTF 65, Revision 1, and (3) the intent of ANSI/ANS-3.1 (September 1979 Draft). CP&L believes that this change is administrative in nature and can be implemented without any decrease in the overall safe and efficient operation of the unit. Therefore, the proposed change does not represent a reduction in the margin of safety.

ENCLOSURE 2 TO SERIAL: HNP-99-082

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
REVISION TO TECHNICAL SPECIFICATION 6.2.2.e – OPERATIONS MANAGEMENT
LICENSE REQUIREMENTS

10 CFR 50.92 EVALUATION

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Carolina Power & Light Company has reviewed this proposed license amendment request and determined that its adoption would not involve a significant hazards consideration. The bases for this determination are as follows:

PROPOSED CHANGE

Harris Nuclear Plant (HNP) proposes revising Technical Specification (TS) 6.2.2.e to modify the requirement for the Manager-Operations to hold a senior reactor operator (SRO) license or have at one time held an SRO license for a similar unit by requiring either the Manager-Operations or an off-shift Operations superintendent to hold an SRO license. Specifically, the proposed TS change would delete the option in TS 6.2.2.e which allows the Manager-Operations to have at one time held a Senior Reactor Operator License for a similar unit and replaces it with the requirement for an off-shift Operations superintendent who holds an SRO license to supervise shift work and licensed activities. This allows additional flexibility in filling the Manager-Operations position while ensuring that a licensed off-shift senior operator will direct the licensed activities of the licensed operators, and also ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position.

Current Requirement

Technical Specification 6.2.2.e states:

The Manager-Operations shall either hold a Senior Reactor Operator License or have at one time held a Senior Reactor Operator License for a similar unit. If the Manager-Operations does not hold a Senior Reactor Operator License, an off-shift Operations superintendent who reports directly to the Manager-Operations and holds a Senior Reactor Operator License shall be designated to supervise shift work and licensed activities.

Proposed Requirement

The proposed revision to Technical Specification 6.2.2.e states:

The Manager-Operations or an off-shift Operations superintendent shall hold a Senior Reactor Operator License. If the Manager-Operations does not hold a Senior Reactor Operator License, an off-shift Operations superintendent who reports directly to the Manager-Operations and holds a Senior Reactor Operator License shall be designated to supervise shift work and licensed activities.

BASIS

This change does not involve a significant hazards consideration for the following reasons:

1. The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The change to Technical Specification 6.2.2.e to require the Manager-Operations or an off-shift Operations superintendent to hold an SRO license is administrative in nature and does not directly affect plant operations. The change does not physically alter the facility in any manner and, as such, does not affect the means in which any safety-related system performs its intended safety function.

Therefore, there would be no increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, the proposed change is administrative in nature. There is no physical alteration to any plant system, nor is there a change in the method in which any safety related system performs its function.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed amendment does not involve a significant reduction in the margin of safety.

The proposed amendment does not reduce the margin of safety as defined in the Safety Analysis Report or the bases contained in the Technical Specifications. The requirement to have a licensed SRO management position responsible for plant operations is maintained within the proposed amendment. The proposed amendment is consistent with (1) 10 CFR 50.54(l), which requires individuals responsible for directing the licensed activities of licensed operators to hold an SRO license, (2) Revision 1 of NUREG-1431, "Standard Technical Specifications Westinghouse Plants," and Technical Specification Traveler Form (TSTF) 65, Revision 1, and (3) the intent of ANSI/ANS-3.1, "Standard for Selection and Training of Personnel for Nuclear Power Plants," (September 1979 Draft).

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

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ENVIRONMENTAL CONSIDERATIONS

10 CFR 51.22(c)(9) provides criterion for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (3) result in a significant increase in individual or cumulative occupational radiation exposure. Carolina Power & Light Company has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows:

PROPOSED CHANGE

Harris Nuclear Plant (HNP) proposes revising Technical Specification (TS) 6.2.2.e to modify the requirement for the Manager-Operations to hold a senior reactor operator (SRO) license or have at one time held an SRO license for a similar unit by requiring either the Manager-Operations or an off-shift Operations superintendent to hold an SRO license. Specifically, the proposed TS change would delete the option in TS 6.2.2.e which allows the Manager-Operations to have at one time held a Senior Reactor Operator License for a similar unit and replaces it with the requirement for an off-shift Operations superintendent who holds an SRO license to supervise shift work and licensed activities. This allows additional flexibility in filling the Manager-Operations position while ensuring that a licensed off-shift senior operator will direct the licensed activities of the licensed operators, and also ensures there is site-specific detailed relevant technical and systems knowledge in a senior operations management position.

Current Requirement

Technical Specification 6.2.2.e states:

The Manager-Operations shall either hold a Senior Reactor Operator License or have at one time held a Senior Reactor Operator License for a similar unit. If the Manager-Operations does not hold a Senior Reactor Operator License, an off-shift Operations superintendent who reports directly to the Manager-Operations and holds a Senior Reactor Operator License shall be designated to supervise shift work and licensed activities.

Proposed Requirement

The proposed revision to Technical Specification 6.2.2.e states:

The Manager-Operations or an off-shift Operations superintendent shall hold a Senior Reactor Operator License. If the Manager-Operations does not hold a Senior Reactor Operator License, an off-shift Operations superintendent who reports directly to the Manager-Operations and holds a Senior Reactor Operator License shall be designated to supervise shift work and licensed activities.

BASIS

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in Enclosure 2, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or increase in the amounts of any effluents that may be released offsite.

The proposed change is administrative in nature and does not involve any new equipment or require existing systems to perform a different type of function than they are currently designed to perform. The change does not introduce any new effluents or increase the quantities of existing effluents. As such, the change cannot affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in a significant increase in individual or cumulative occupational radiation exposure.

The proposed change is administrative in nature and does not result in any physical plant changes or new surveillances which would require additional personnel entry into radiation controlled areas. Therefore, the amendment has no effect on either individual or cumulative occupational radiation exposure.

ENCLOSURE 4 TO SERIAL: HNP-99-082

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT
REVISION TO TECHNICAL SPECIFICATION 6.2.2.e – OPERATIONS MANAGEMENT
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PAGE CHANGE INSTRUCTIONS

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