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 CUTTER, A.B. Carolina Power & Light Co.
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SUBJECT: Application for amend to License NPF-63, clarifying requirements of Item 6.a of Tech Spec Table 3.3-3.

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Carolina Power & Light Company

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OCT 26 1989

A. B CUTTER
Vice President
Nuclear Services Department

SERIAL: NLS-89-161
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
AUXILIARY FEEDWATER MANUAL INITIATION

Gentlemen:

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Carolina Power & Light Company (CP&L) hereby requests a revision to the Technical Specifications for the Shearon Harris Nuclear Power Plant.

The proposed amendment clarifies the requirements of Item 6.a of Technical Specification Table 3.3-3, Engineered Safety Features Actuation System Instrumentation. Currently, the required number of channels for manual initiation of auxiliary feedwater is listed as one per pump. This is correct for the motor driven auxiliary feedwater pumps; however, the turbine driven auxiliary feedwater pump has two control channels, one of which is required to manually start the pump. The proposed amendment reflects this configuration. As a result of this change, Technical Specification Table 3.3-3, Action 23 has also been revised.

Enclosure 1 provides a detailed description of the proposed changes and the basis for the changes.

Enclosure 2 details the basis for the Company's determination that the proposed changes do not involve a significant hazards consideration.

Enclosure 3 is an environmental evaluation which demonstrates that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9), therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.

Enclosure 4 provides the proposed Technical Specification pages.

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THE
UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D. C. 20246

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Please refer any questions regarding this submittal to Mr. Steven Chaplin at (919) 546-6623.

Yours very truly,



A. B. Cutter

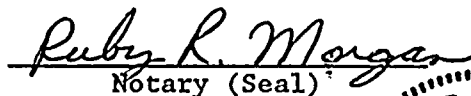
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Enclosures:

1. Basis for Change Request
2. 10CFR50.92 Evaluation
3. Environmental Evaluation
4. Technical Specification Pages

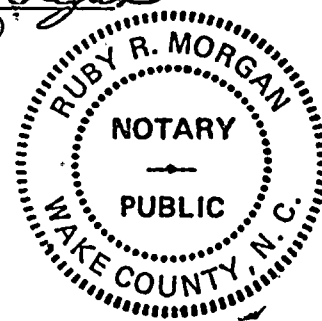
cc: Mr. R. A. Becker
Mr. W. H. Bradford
Mr. Dayne H. Brown
Mr. S. D. Ebnetter

A. B. Cutter, 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 officers, employees, contractors, and agents of Carolina Power & Light Company.


Notary (Seal)

My commission expires:

11/27/89



SECRET

ENCLOSURE 1

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400
OPERATING LICENSE NPF-63
REQUEST FOR LICENSE AMENDMENT
AFW MANUAL INITIATION

BASIS FOR CHANGE REQUEST

Proposed Change

The proposed amendment clarifies the requirements of Item 6.a of Technical Specification Table 3.3-3, Engineered Safety Features Actuation System Instrumentation. Currently, the required number of channels for manual initiation of auxiliary feedwater is listed as one per pump. This is correct for the motor driven auxiliary feedwater pumps; however, the turbine driven auxiliary feedwater pump has two control channels per pump, one of which is required to manually start the pump. The proposed amendment incorporates a separate line item for the motor and turbine driven pumps reflecting the number of channels required for each pump. In addition, the action statement associated with Technical Specification Table 3.3-3, Item 6.a (Action 23) has been revised to maintain consistency with the revised limiting condition for operation.

Basis

Item 6.a of Technical Specification Table 3.3-3, Engineered Safety Features Actuation System Instrumentation specifies the number of channels required for manual initiation of the auxiliary feedwater pumps. The existing requirement calls for one channel per pump. This is correct for the motor driven auxiliary feedwater pumps; however, it does not accurately reflect the design for the turbine driven auxiliary feedwater pump. Two channels exist for manual initiation of the turbine driven auxiliary feedwater pump, one for each of the two steam admission valves. Opening of one steam admission valve is sufficient to start the pump. The requested revision to Item 6.a incorporates a separate line item for the motor and turbine driven pumps reflecting the number of channels required for each pump. The proposed change would require the turbine driven auxiliary feedwater pump to be declared inoperable if either control channel is inoperable. This is more restrictive than the existing Technical Specification which could be interpreted to allow indefinite operation with one of the turbine driven auxiliary feedwater pump control channels inoperable.

In addition, the action statement associated with Item 6.a (Action 23) has been revised to maintain consistency with the revised limiting condition for operation.

The action statement reference to "... one less than the Minimum ..." was changed to "... less than the Minimum ..." so that Action Statement 23 now reads:

With the number of OPERABLE channels less than the Minimum Channels OPERABLE requirement, declare the associated equipment inoperable and take the appropriate ACTION required in accordance with the specific equipment specification.

With regard to the AFW pumps, if one or more instrument channels are inoperable for any pump, that pump is declared inoperable and the appropriate Action Statement of LCO 3.7.1.2, Auxiliary Feedwater System, is then followed.

Action Statement 23 also applies to Technical Specification Table 3.3-3 Item 4.a.1, Individual MSIV Closure. However, the proposed change to Action 23 has no affect on the compensatory measures required in the event of an inoperable channel.

ENCLOSURE 2

SHEARON HARRIS NUCLEAR POWER PLANT
NRC DOCKET NO. 50-400
OPERATING LICENSE NPF-63
REQUEST FOR LICENSE AMENDMENT
AFW MANUAL INITIATION

10CFR50.92 EVALUATION

The Commission has provided standards in 10CFR50.92(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

The proposed amendment clarifies the requirements of Item 6.a of Technical Specification Table 3.3-3, Engineered Safety Features Actuation System Instrumentation. Currently, the required number of channels for manual initiation of auxiliary feedwater is listed as one per pump. This is correct for the motor driven auxiliary feedwater pumps; however, the turbine driven auxiliary feedwater pump has two control channels, one of which is required to manually start the pump. The proposed amendment incorporates a separate line item for the motor and turbine driven pumps reflecting the number of channels required for each pump. In addition, the action statement associated with Technical Specification Table 3.3-3, Item 6.a (Action 23) has been revised to maintain consistency with the revised limiting condition for operation.

Basis

The 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 proposed amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. The change is being made so that Technical Specification Table 3.3-3, Item 6.a more accurately reflects actual plant design, thereby avoiding possible operator error.

The proposed change requires the turbine driven auxiliary feedwater pump to be declared inoperable if either control channel is inoperable. This is more restrictive than the existing Technical Specification which could be interpreted to allow indefinite operation with one of the turbine driven auxiliary feedwater pump control channels inoperable.

In addition, the action statement associated with Item 6.a (Action 23) has been revised to maintain consistency with the revised limiting condition for operation.

Action Statement 23 also applies to Technical Specification Table 3.3-3 Item 4.a.1, Individual MSIV Closure. However, the proposed change to Action 23 has no affect on the compensatory measures required in the event of an inoperable channel.

2. As stated in Item 1, the proposed amendment does not: (1) alter any existing equipment; or (2) introduce any new equipment. Therefore, the proposed amendment can not create the possibility of a new or different kind of accident from any accident previously evaluated.
3. The proposed amendment does not introduce any new equipment nor does it require any existing equipment or systems to perform a different type of function than they are currently designed to perform. The change is being made so that Technical Specification Table 3.3-3, Item 6.a more accurately reflects actual plant design. The proposed change requires the turbine driven auxiliary feedwater pump to be declared inoperable if either control channel is inoperable. This is more restrictive than the existing Technical Specification which could be interpreted to allow indefinite operation with one of the turbine driven auxiliary feedwater pump control channels inoperable.

In addition, the action statement associated with Item 6.a (Action 23) has been revised to maintain consistency with the revised limiting condition for operation.

Action Statement 23 also applies to Technical Specification Table 3.3-3 Item 4.a.1, Individual MSIV Closure. However, the proposed change to Action 23 has no affect on the compensatory measures required in the event of an inoperable channel.

Based on the above reasoning, the Company has determined that the proposed amendment represents an enhancement and does not involve a reduction in the margin of safety.

ENCLOSURE 3

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REQUEST FOR LICENSE AMENDMENT

ENVIRONMENTAL CONSIDERATION

10CFR51.22(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; and (3) result in an 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 10CFR51.22(c)(9). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment. The basis for this determination follows:

Proposed Change

The proposed amendment clarifies the requirements of Item 6.a of Technical Specification Table 3.3-3, Engineered Safety Features Actuation System Instrumentation. Currently, the required number of channels for manual initiation of auxiliary feedwater is listed as one per pump. This is correct for the motor driven auxiliary feedwater pumps; however, the turbine driven auxiliary feedwater pump has two control channels, one of which is required to manually start the pump. The proposed amendment incorporates a separate line item for the motor and turbine driven pumps reflecting the number of channels required for each pump. In addition, the action statement associated with Technical Specification Table 3.3-3, Item 6.a (Action 23) has been revised to maintain consistency with the revised limiting condition for operation.

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(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 significant increase in the amounts of any effluents that may be released offsite. The proposed amendment does not introduce any new equipment nor does it require any existing

equipment or systems to perform a different type of function than they are currently designed to perform. The change is being made so that Technical Specification Table 3.3-3, Item 6.a more accurately reflects actual plant design. As such, the change can not affect the types or amounts of any effluents that may be released offsite.

3. The proposed amendment does not result in an increase in individual or cumulative occupational radiation exposure. The proposed change revises the Technical Specifications to more accurately reflect actual plant design. No additional surveillances or testing results from the amendment. Therefore, the amendment has no affect on either individual or cumulative occupational radiation exposure.