

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

1800 M STREET, N.W.

WASHINGTON, D.C. 20036

(202) 822-1000

TELECOPIER

(202) 822-1099 & 822-1199

RAPIDFAX 100

(202) 822-1072

TELEX

89-2693 (SHAWLAW WSH)

CABLE "SHAWLAW"

JOHN F. DEALY*

COUNSEL

RAMSAY D. POTTS, P.C.
STUART L. PITTMAN, P.C.
GEORGE F. TROWBRIDGE, P.C.
STEPHEN D. POTTS, P.C.
GERALD CHARNOFF, P.C.
PHILIP D. BOSTWICK, P.C.
R. TIMOTHY HANLON, P.C.
GEORGE M. ROGERS, JR., P.C.
FRED A. LITTLE, P.C.
JOHN B. RHINELANDER, P.C.
BRUCE W. CHURCHILL, P.C.
LESLIE A. NICHOLSON, JR., P.C.
MARTIN D. KRALL, P.C.
RICHARD J. KENDALL, P.C.
JAY E. SILBERG, P.C.
BARBARA M. ROSSOTTI, P.C.
GEORGE V. ALLEN, JR., P.C.
FRED DRABNER, P.C.
R. KENLY WEBSTER, P.C.
NATHANIEL P. BREED, JR., P.C.
MARK AUGENBLICK, P.C.
ERNEST L. BLAKE, JR., P.C.
CARLETON S. JONES, P.C.
THOMAS A. BAXTER, P.C.
JAMES N. BURGER, P.C.
SHELDON J. WEISEL, P.C.

JOHN A. McCULLOUGH, P.C.
J. PATRICK HICKEY, P.C.
GEORGE P. MICHAELY, JR., P.C.
J. THOMAS LENHART, P.C.
STEVEN L. MELTZER, P.C.
DEAN D. AL'ICK, P.C.
JOHN ENGEL, P.C.
CHARLES B. TEMKIN, P.C.
STEPHEN B. HUTTLER, P.C.
WINTHROP N. BROWN, P.C.
JAMES B. HAMLIN, P.C.
RANDAL B. KELL, P.C.
ROBERT E. ZAMLER, P.C.
ROBERT B. ROBBINS, P.C.
STEVEN M. LUCAS, P.C.
DAVID M. RUBENSTEIN, P.C.
RICHARD E. GALEN, P.C.
LYNN WHITTLESEY WILSON, P.C.
MATIAS F. TRAVIESO-DIAZ, P.C.
VICTORIA J. PERKINS, P.C.
JOHN M. ONEILL, JR., P.C.
JAY A. EPSTEIN, P.C.
RAND L. ALLEN, P.C.
TIMOTHY B. MCBRIDE, P.C.
ELISABETH M. PENDLETON, P.C.
HARRY H. GLASSPIEGEL, P.C.

JEFFERY L. YABLON
JACK MCKAY
THOMAS H. MCCORMICK
JOHN L. CARR, JR.
PHILIP J. HARVEY
ROBERT M. GORDON
BARBARA J. MORGEN
BONNIE S. GOTTLIEB
HOWARD H. SHAFFERMAN
DEBORAH B. BAUSER
SCOTT A. ANENBERG
CAMPBELL KILLEFER
SETH H. HOOGLASIAN
SHEILA MCC. HARVEY
DELISSA A. RIDGWAY
KENNETH J. HAUTMAN
DAVID LAWRENCE MILLER
FREDERICK L. KLEIN
STEVEN P. PITLER*
RICHARD J. PARRINO
ELLEN A. FREDEL*
HANNAH E. M. LIEBERMAN
SANDRA E. FOLSOM
JUDITH A. SANDLER
EDWARD D. YOUNG, III

ANDREW D. ELLIS
RICHARD A. SAMP
THOMAS E. CROCKER, JR.
WENDELIN A. WHITE
STANLEY M. BARG
KRISTI L. LIMBO
LESLIE K. SMITH
VIRGINIA S. RUTLEDGE
KATHERINE P. CHEEK
JANICE LEHRER-STEIN
TRAVIS T. BROWN, JR.
RICHARD H. KRONTHAL
STEPHEN B. HEIMANN
SANDRA E. BRUSCA*
EILEEN L. BROWNELL
PAMELA H. ANDERSON
ALEXANDER D. TOMASZCZUK
PHILIP D. PORTER
MICHAEL A. SWIGER
ELLEN SHERIFF
ANITA J. FABIAN
EILEEN M. GLEIMER
DAVID R. SAHR
C. BOWDOIN TRAIN
* NOT ADMITTED IN D.C.

WRITER'S DIRECT DIAL NUMBER

(202) 822-1090

April 19, 1983

James L. Kelley, Esquire
Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Carolina Power & Light Company
and North Carolina Eastern
Municipal Power Agency
(Shearon Harris Nuclear Power Plant, Units 1 and 2)
Docket Nos. 50-400 OL and 50-401 OL

Administrative Judges Kelley, Bright and Carpenter:

Please find enclosed a copy of Applicants' schedule for implementation of the requirements of Generic Letter 82-33, Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability, which was filed with the Director, Office of Nuclear Reactor Regulation, on April 15, 1983. Copies of the enclosed schedule were also filed with intervenors in the above referenced proceeding on April 15, 1983.

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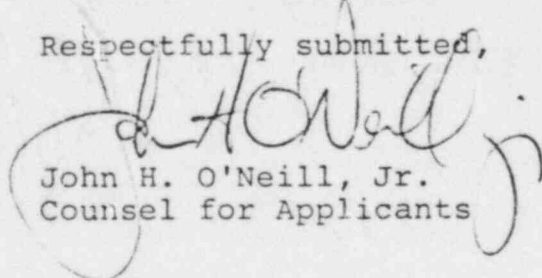
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Administrative Judges James L. Kelley, Esq.
Mr. Glenn O. Bright
Dr. James H. Carpenter
April 19, 1983
Page Two

At the prehearing conference held on February 24, 1983, Applicants proposed that the Board defer ruling on certain contentions filed by Intervenor Dr. Richard Wilson and Intervenor Wells Eddleman on the Detailed Control Room Design Review ("DCRDR") pending Applicants' filing the enclosed schedule for implementation of the requirements of Supplement 1 to NUREG-0737. At the time of the prehearing conference, Applicants intended on April 15, 1983 to do more than submit a schedule for implementing the requirements of Supplement 1 to NUREG-0737, i.e. to supplement the Summary DCRDR Report previously submitted to the NRC Staff on December 7, 1982. Applicants suggested that after reviewing the additional information provided on April 15, 1983, the intervenors might be in a position to revise, amend, or withdraw certain contentions which simply allege deficiencies in the Summary DCRDR Report. The Board adopted Applicants' proposal, deferring its rulings on Dr. Wilson and Mr. Eddleman's Contentions, and providing that the Intervenor would have thirty days from receipt of Applicants' April 15, 1983 filing within which to revise, amend or renew contentions regarding the detailed control room design review. Tr. 589-605.

Applicants now intend to file a complete supplement to the Summary DCRDR Report on or before June 1, 1983. In light of this schedule, Applicants determined that it would be inefficient to partially supplement the Summary DCRDR Report with the enclosed April 15, 1983 filing, with a second and final supplement to be filed on or before June 1, 1983. Counsel for Applicants have discussed this schedule with both Mr. Eddleman and Dr. Wilson and have their concurrence in proposing to the Board that the schedule for submitting revised, amended or renewed contentions on the DCRDR be deferred until thirty days from receipt of Applicants' supplement to the Summary DCRDR Report. Thereafter Applicants and the Staff would be afforded fifteen days in which to respond to any pleadings filed by intervenors and the DCRDR issue would be before the Board for decision.

Respectfully submitted,


John H. O'Neill, Jr.
Counsel for Applicants

cc: Service List



Carolina Power & Light Company

COPY

April 15, 1983

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NRC

'83 APR 20 10:52

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NOS. 1 AND 2
DOCKET NOS. 50-400 AND 50-401
NRC GENERIC LETTER 82-33
REQUIREMENTS FOR EMERGENCY RESPONSE CAPABILITY

Dear Mr. Denton:

On December 30, 1982 Carolina Power & Light Company (CP&L) received Generic Letter 82-33, Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability. As a participating member of the Nuclear Utility Task Action Committee on Emergency Response Capabilities (ERC NUTAC), which includes over forty utilities and is administratively supported by INPO, CP&L is developing an integrated implementation program which responds to the requirements of Generic Letter 82-33 as follows:

PROGRAM PLAN AND SCHEDULE

Due to construction schedule requirements, CP&L decided to make early commitments on emergency response capabilities in advance of the issuance of Supplement 1 to NUREG-0737. However, where appropriate, CP&L is using the ERC NUTAC's draft Guidelines for an Integrated Implementation Plan, as an input for remaining plant-specific integration planning.

In developing the remaining SHNPP integration criteria, other guidelines prepared by the NUTAC's, and the Westinghouse Owners' Group (WOG) will be evaluated.

With Commission approval of Supplement 1 to NUREG-0737, we have now finalized schedules for completion of these activities. Attachment 1 provides plans and schedules for each activity, integrated with our current

April 15, 1983

engineering, construction and startup schedule. As proposed by Generic Letter 82-33, we will meet shortly with our NRC Project Manager to explain in more detail, our integrated implementation plan as described in Attachment 1.

Yours very truly,

Original Signed By

E. E. UTLEY

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

EEU/SRZ/lr (014CSRZh)

E. E. Utley, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge or based upon information and belief.

Lisa M. Randall

Notary (Seal)

My Commission Expires: 5/18/83

cc: Mr. N. Prasad Kadambi (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
Mr. J. P. O'Reilly (NRC-RII)
Mr. Travis Payne (KUDZU)
Mr. Daniel F. Read (CHANGE/ELP)
Chapel Hill Public Library
Wake County Public Library

Mr. Wells Eddleman
Dr. Phyllis Lotchin
Ms. Patricia T. Newman
Mr. John D. Runkle
Dr. Richard D. Wilson
Mr. G. O. Bright (ASLB)
Dr. J. H. Carpenter (ASLB)
Mr. J. L. Kelley (ASLB)

ATTACHMENT 1

PLANS AND SCHEDULES FOR EMERGENCY RESPONSE CAPABILITIES

SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

Although the SPDS was procured prior to issuance of Generic Letter 82-33, the SPDS will meet the requirements of Supplement 1 to NUREG-0737.

A Purchase Order to provide the hardware, software, and analysis for an SPDS has been placed and the conceptual design will be completed by May 1983. Carolina Power & Light Company anticipates submittal of the SPDS safety analysis by September 1983. SPDS is expected to be operable, and training will be complete by April 1985, before fuel load in June, 1985.

As requested by Generic Letter 82-33, CP&L does not desire an NRC pre-implementation review.

DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

The Detailed Control Room Design Review (DCRDR) was conducted between April 1980 and January 1981 with the final summary report titled "Human Factors Design Evaluation Report for the Shearon Harris Unit 1 Control Room" (summary report) issued in September 1981 and submitted to the NRC on December 7, 1982. The summary report was prepared and submitted to the NRC prior to promulgation of the requirements of Supplement 1 to NUREG-0737. In general, the summary report demonstrates that the DCRDR conducted by CP&L meets the requirements set forth in Supplement 1 to NUREG-0737. During a meeting held with the NRC staff on March 25, 1983, CP&L agreed to provide additional information to facilitate the staff assessment of the DCRDR. This additional information will be supplied to the staff by June 1983, and will consist of (1) a more detailed description of the SHNPP-1 DCRDR methods and procedures, (2) a description of the review team composition and qualifications, and (3) a description of resolution of the recommendations in the summary report.

A task analysis was performed on H. B. Robinson Unit 2 Emergency Operating Procedures (EOP's) adapted to the SHNPP-1 design. SHNPP-1 symptom-based EOP's are currently under development and will be task analyzed prior to implementation. The design improvement verification and validation will be performed when the control room is functional with SPDS and RG-1.97 instrumentation installed and the symptom-based EOP's implemented.

REGULATORY GUIDE 1.97

Carolina Power & Light Company will consider the NUTAC guidance documents on RG-1.97 in developing a final plan for RG-1.97 compliance. A report describing RG-1.97 compliance plans will be submitted to NRC by August, 1983. SHNPP will meet the RG-1.97 requirements consistent with the stipulations provided in Supplement 1 to NUREG-0737, prior to fuel load in June, 1985.

UPGRADE EMERGENCY OPERATING PROCEDURES (EOPs)

Carolina Power & Light Company is drafting EOPs using the Westinghouse Owner's Groups technical guidelines and INPO's EOP Writing Guideline. In accordance with Supplement 1 to NUREG-0737, we will submit a procedures generation package, including plant-specific technical guidelines, and plant-specific

writers guide, and description of our program for verification and validation by nine months prior to fuel load.

Upon completion of SPDS, RG-1.97 and CRDR activities, we will complete operator training prior to Fuel Load in June, 1985.

EMERGENCY RESPONSE FACILITIES

The EOF and TSC are scheduled to be functional by October, 1984. In addition, when the Emergency Response Facility Information System (ERFIS) is implemented along with the SPDS in the EOF, TSC, and Control Room, we anticipate training using these systems will be completed by April 1985.

We anticipate being able to meet NRC requirements listed in Supplement 1 to NUREG-0737 for construction of Emergency Response Facilities with the exception of one item shown on Table 1. Our EOF is located 2.2 miles from the plant and will meet the same radiation protection criteria as the TSC and control room. No occupant of the EOF will receive more than 5 REM (or equivalent) during the design basis accident. In addition, the state and local agencies will not be using our EOF for their State Emergency Response Team Headquarters, but have elected to use the State Administration Building in Raleigh, N.C. Should utility, local, federal or state personnel wishing to travel to the EOF elect not to do so because of radiological protection reasons, an alternate facility is available at the State Administration Building in Raleigh, 20.6 miles from the plant, for their use in communicating with the TSC and EOF. As described in the draft NUTAC Guideline on ERFs, we believe that an exception to the Commission's requirement for a backup EOF is justified because:

- (1) There are no situations whereby evacuation of the primary EOF would be required.
- (2) State and local agencies will not use the primary EOF but will establish reliable communications from their Emergency Center at the State Administration Building.
- (3) Emergency response will be enhanced by remaining in the primary EOF and not by retreating to a backup EOF with less reliable communications, facilities and training.
- (4) An alternate communication facility exists at Raleigh, N.C.

As provided in Paragraph 3.7 of Supplement 1 to NUREG-0737, NRC will make allowances for work already done by licensees in good-faith to meet previous NRC guidance. We feel that planning and training to remain in the primary EOF is a more reliable and enhanced emergency response position, and is consistent with the positions of many other licensees that are in a similar situation of having proceeded to construct these close-in facilities in good faith. Carolina Power & Light Company, therefore, requests written confirmation from the Commission that our reasoning is sound and a backup EOF would not enhance our emergency response capability nor those of the federal, state, or local agencies.

SUBMITTALS TO NRC

In summary, CP&L expects to submit the information requested in Supplement 1 to NUREG-0737 for NRC review in accordance with the following schedule:

<u>Submittal</u>	<u>NUREG-0737 Supplement 1 Reference</u>	<u>Schedule</u>
1. SPDS Safety Analysis	4.2a	9/83
2. CRDR Summary Report	5.2b	Submitted 12/82 (To be supplemented - 6/83)
3. RG-1.97 Report 6.2		8/83
4. WOG EOP Technical Guidelines (Generic)	7.2a	Revision 1 (Scheduled for completion August 1983)
5. EOP Procedures Gen- eration Package	7.2b	nine months prior to fuel load

(014CSRZ1h-1r)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

CAROLINA POWER & LIGHT COMPANY)
AND NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)

(Shearon Harris Nuclear Power)
Plant, Units 1 and 2))

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Docket Nos. 50-400 OL
50-401 OL
BRANCH

SERVICE LIST

James L. Kelley, Esquire
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Charles A. Barth, Esquire
Myron Karman, Esquire
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Daniel F. Read, President
Chapel Hill Anti-Nuclear Group Effort
P.O. Box 524
Chapel Hill, North Carolina 27514

John D. Runkle, Esquire
Conservation Council of North Carolina
307 Granville Road
Chapel Hill, North Carolina 27514

M. Travis Payne, Esquire
Edelstein and Payne
P.O. Box 12643
Raleigh, North Carolina 27605

Dr. Richard D. Wilson
729 Hunter Street
Apex, North Carolina 27502

Mr. Wells Eddleman
718-A Iradell Street
Durham, North Carolina 27705

Ms. Patricia T. Newman
Mr. Slater E. Newman
Citizens Against Nuclear Power
2309 Weymouth Court
Raleigh, North Carolina 27612

Richard E. Jones, Esquire
Vice President & Senior Counsel
Carolina Power & Light Company
P.O. Box 1551
Raleigh, North Carolina 27602

Dr. Phyllis Lotchin
108 Bridle Run
Chapel Hill, North Carolina 27514

-2-
Deborah Greenblatt, Esquire
1634 Crest Road
Raleigh, North Carolina 27606

Bradley W. Jones, Esquire
U.S. Nuclear Regulatory Commission
Region II
101 Marrietta Street
Atlanta, Georgia 30303

Ruthanne G. Miller, Esquire
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Karen E. Long, Esq.
Staff Attorney
Public Staff - NCUC
P.O. Box 991
Raleigh, North Carolina 27602