



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION II  
101 MARIETTA STREET, N.W., SUITE 2900  
ATLANTA, GEORGIA 30323-0199

May, 6, 1996

[REDACTED] *me*

SUBJECT: RII-95-A-0093 - CONTAINMENT ISOLATION VALVE POSITION INDICATION NOT  
ADDRESSED AND QUESTIONABLE OPERATOR AND OVERTIME  
PRACTICES

Dear [REDACTED] *me*

*7C*  
This refers to our letter dated January 23, 1996, in which you were informed  
that we were continuing our review of the concerns you expressed on  
[REDACTED] with Mr. [REDACTED] of our staff related to operations and  
overtime practices at the Harris Nuclear Plant.

Our review regarding this matter has been completed, and our findings are  
documented in the enclosures to this letter. Based on the information  
provided, we were unable to substantiate the allegation.

This concludes the staff's activities regarding this matter. If you have any  
questions, you may contact at 1-800-577-8510 or (404) 331-5535 or by mail at  
P.O. Box 845, Atlanta, GA 30301.

Sincerely,

*Milton B. Skymlock*  
Milton B. Skymlock, Chief  
Reactor Projects Branch 4  
Division of Reactor Projects

- Enclosures:
- 1. Allegation Evaluation Report
  - 2. Inspection Report No. 50-400/95-11
  - 3. Inspection Report No. 50-400/95-15
  - 4. Inspection Report No. 50-400/96-01

Certified Mail No. Z 238 513 602  
RETURN RECEIPT REQUESTED

information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions *7C*  
FOIA- 2001-0130

*B/10*

ALLEGATION EVALUATION REPORT

ALLEGATION NUMBER RII-95-A-0093

CONTAINMENT ISOLATION AND OVERTIME

CAROLINA POWER AND LIGHT

SHEARON HARRIS NUCLEAR PLANT UNIT 1

DOCKET NUMBER 50-400

**ALLEGATION:**

7C On [REDACTED] the CIs contacted the resident inspector and told him that management did not properly address questionable containment isolation valve position indication in the control room and management regularly schedules [REDACTED] for abnormal amounts of overtime to achieve adequate shift coverage and/or to support other plant activities.

**EVALUATION:**

- a. The inspector reviewed Adverse Condition and Feedback Report (ACFR) [REDACTED] which was associated with the questionable containment isolation valve position indication. The valve was [REDACTED] a Post Accident Sampling System valve that has control room remote position indication only. The problem described was that on May 11, 1995 the operators opened the valve from the main control room and received mid-position indication instead of full open indication. The valve was not declared inoperable until June 1, 1995. The valve's safety function position was closed which was not in question. Management dispositioned the issue by declaring that the valve would meet its safety function since it was required to be closed for accident conditions. On June 12 the valve was successfully stroked from full open to full closed and declared operable. On June 7, 1995 the inspector observed an operator opening the valve and witnessed the mid-position indication. On June 11, 1995 the inspector witnessed an operator opening the valve and this time the full open position was indicated on the control panel. Inspector Followup Item 95-11-01 was opened for further review of this issue.

Further review was conducted as documented in IR 50-400/95-15. The inspector reviewed NUREG-1482, Guidelines for Inservice Testing at Nuclear Power Plants. The valve was in the licensee's ASME Section XI Inservice Testing Program which is implemented through licensee procedure ISI-203, ASME Section XI Pump and Valve Program Plan. The program requires a specific time from full open to full closed for the valve to meet the ASME requirements. There was no indication that the valve would not close nor that it would not meet the ASME requirements. The June 12, 1995 valve timing confirmed that the valve met the ASME requirements and therefore had been operable on May 11, 1995. The inspector concluded that the CP&L management position was accurate.

- b. The inspector reviewed a random selection of time sheets for Operations personnel to determine whether overtime usage complied with requirements in the plant's Technical Specifications. This review included time sheets for auxiliary operators, licensed reactor and senior reactor operators, Shift Supervisors, and Senior Technical Advisors. Time sheets from May 1995 through November 1995 were reviewed to include those months affected by the recent refueling and forced outages. Time sheets for nearly 30 [REDACTED] were reviewed. The review is documented in Inspection Report 400/96-01. 9C

The review found that the majority of operators charged time within the Technical Specification limits. In very few cases, charged time exceeded the limits. In those situations, as allowed by Technical Specifications, deviations were usually pre-approved by the Plant General Manager or his designee. The inspector found four questionable cases where overtime limits appeared to be exceeded without management approval. These cases involved longer than usual shift turnovers, or in one case, attendance at a post-shift meeting prior to departing for two days off shift. Shift turnover hours were explicitly excluded from the limitations by Technical Specifications. The special meeting case was determined by the inspector not to violate the intent of the Technical Specification requirement.

In months leading up to and during the last refueling outage, operators worked large amounts of overtime. Technical Specification limits were heavily challenged - but not exceeded - during this period. A review of year-end overtime statistics showed that the average overtime per operator was between 20 and 25 percent of the total time worked, with the majority of these hours to support the refueling outage. Overtime usage in 1995 exceeded the usage in previous years.

#### CONCLUSIONS:

- a. The concern that management did not properly address questionable containment isolation valve position indication in the control room was not substantiated.
- b. The concern that management normally schedules [REDACTED] for abnormal amounts of overtime to achieve adequate shift coverage and/or to support other plant activities could not be substantiated in that no violations of Technical Specification overtime requirements and no safety concerns with overtime practices in 1995 were identified. However, overtime for 1995 was higher than in previous years. 7C