



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

OKD

FILE

May 6, 1996

[Redacted] ATC

SUBJECT: RII-95-A-0102 - [Redacted] Concerns

Dear [Redacted]

re

This refers to our letter dated April 26, 1996, in which we advised you the results of our review of the concerns you expressed regarding design of a modification to the [Redacted] at the Shearon Harris Nuclear Power Plant. It has been brought to our attention that the Subject heading in our transmittal letter was incorrect. The transmittal letter has been corrected and is forwarded to you as an enclosure to this letter.

Sincerely,

Charles A. Casto, Chief  
Engineering Branch  
Division of Reactor Safety

Certified Mail No. Z-238-517-997  
RETURN RECEIPT REQUESTED

Enclosure: As stated

cc: B. Uryc, EICS

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

2014



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

May 6, 1996

[REDACTED] 7C  
SUBJECT: RII-95-A-0102 [REDACTED] Concerns

Dear [REDACTED] 7C

This refers to our letter dated February 12, 1996 in which we advised you that we were continuing our review of the concerns you expressed regarding design of a modification to the [REDACTED] at the Shearon Harris Nuclear Power Plant.

Our review regarding this matter has been completed and our findings are documented in the enclosures to this letter. We were able to substantiate the concern regarding use of [REDACTED] information for the [REDACTED] modification. [REDACTED] in design of an [REDACTED]. A violation of regulatory requirements was identified relating to failure to perform surveillance testing to confirm [REDACTED]. The concern regarding removal of the [REDACTED] without sufficient evaluation was not substantiated.

This concludes the staff's activities regarding this matter. If you have any questions, you may contact me at 1-800-577-8510 or 404-331-4182, or by mail at P. O. Box 845, Atlanta, GA 30301.

Sincerely,

Charles A. Casto, Chief  
Engineering Branch  
Division of Reactor Safety

Certified Mail No. 7-238-517-997  
RETURN RECEIPT REQUESTED

Enclosures: 1. Allegation Evaluation Report  
2. Report No. 50-400/96-01  
3. Report No. 50-400/96-02

cc: B. Uryc, EICS



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

April 26, 1996

[REDACTED]

7C

102

SUBJECT: RII-95-A-0084 - QUESTIONABLE ENGINEERING PRACTICES

7C Dear [REDACTED]

This refers to our letter dated February 12, 1996, in which we advised you that we were continuing our review of the concerns you expressed regarding design of a modification to the [REDACTED] at the Shearon Harris Nuclear Power Plant.

7C Our review regarding this matter has been completed and our findings are documented in the enclosures to this letter. We were able to substantiate the concern regarding use of [REDACTED] information for the [REDACTED] in design of an [REDACTED] modification. [REDACTED] A violation of regulatory requirements was identified relating to failure to perform surveillance testing to confirm [REDACTED]. The concern regarding removal of the [REDACTED] without sufficient evaluation was not substantiated.

This concludes the staff's activities regarding this matter. If you have any questions, you may contact me at 1-800-577-8510 or 404-331-4182, or by mail at P. O. Box 845, Atlanta, GA 30301.

Sincerely,

Charles A. Casto, Chief  
Engineering Branch  
Division of Reactor Safety

Certified Mail No. 7-238-517-998  
RETURN RECEIPT REQUESTED

- Enclosures: 1. Allegation Evaluation Report  
2. Report No. 50-400/96-01  
3. Report No. 50-400/96-02

cc: B. Uryc, EICS  
O. DeMiranda, EICS

Allegation Evaluation Report  
Allegation Number RII-95-0102

[REDACTED] & TC  
[REDACTED]  
CP&L - Harris Nuclear Plant  
Docket Number 50-400

In a letter dated [REDACTED] an individual expressed two concerns relative to the design of a modification to the [REDACTED] system at the Harris plant. The purpose of this modification, which was implemented under plant change request [REDACTED] was to use the [REDACTED] at [REDACTED] to provide [REDACTED] to the [REDACTED] during plant startups. The two concerns were as follows: TC

- Use of [REDACTED] information for design.
- Removal of [REDACTED] without sufficient evaluation. TC

These concerns were reviewed during inspections conducted January 29 - February 2, 1996, and March 25 - March 29, 1996, which are documented in NRC Inspection Report numbers 50-400/96-01 and 96-02.

#### EVALUATION

##### 1. Concern

A weakness was identified during NAD assessment [REDACTED] concerning failure of the design review process to question a design input to [REDACTED] which was based on [REDACTED] information provided by a vendor during a [REDACTED]

##### Discussion

The inspector reviewed NAD assessment [REDACTED]. The findings from this assessment were one issue and two weaknesses. One of the weaknesses involved basing design of the modification [REDACTED] using information obtained from a [REDACTED]. The information regarded the [REDACTED] of the [REDACTED]. The [REDACTED] indicated that the [REDACTED] could not provide the specific information requested by the CP&L NED design engineer. The NED engineer, [REDACTED] assumed a [REDACTED] of [REDACTED] for the [REDACTED] as a [REDACTED]. The [REDACTED] engineer performing the [REDACTED] did not question this [REDACTED]. TC

The licensee's corrective actions to address this problem were documented on [REDACTED]. Corrective actions included training of mechanical design engineers on the importance of obtaining accurate [REDACTED]. The inspector noted that the results of the investigation conducted to resolve this problem concluded that post installation testing would identify any error in the [REDACTED].

However, this testing had not been performed.

Numerous issues have been identified by the licensee regarding [REDACTED] including four LERs. The inspector reviewed [REDACTED] which investigated the failure to perform ESF response time testing of the auto open feature of the AFW flow control valves. The inspector reviewed [REDACTED] which evaluated the response time of the AFW flow control valves. The conclusions of the ESR were that the valves were operable and would perform the intended function. The licensee reported this problem as [REDACTED] which is discussed in NRC Inspection Report number 50-400/96-01. A non-cited violation, number NCV 400/96-01-05, was identified for failure to incorporate the response time testing requirements in surveillance test procedures. The failure of licensee engineers to verify that testing of the response time for the AFW valves was included in the [REDACTED] post installation requirements was identified as a weakness in the licensee's corrective action program. A violation was not identified since the issue was similar to that identified in NCV 400/96-01-05.

### Conclusions

The concern was substantiated. Although the licensee's NAD assessment program had disclosed this problem, the corrective actions implemented to address the issue, when it was initially discovered, were inadequate. However, subsequent testing of the AFW valves demonstrated that the valves would perform as expected. Due to the numerous issues identified regarding [REDACTED] licensee engineers performed a self-assessment of [REDACTED] and other modifications. Several findings were identified in this assessment, which when implemented, will improve the modification process.

### 2. Concern

Implementation of [REDACTED] to use the [REDACTED]

These [REDACTED] had been previously established because [REDACTED] had been the cause of check valve failures on the discharge side of the AFW pumps. The concern was that sufficient evaluation may not have been performed to evaluate the effect of the [REDACTED]. The CI stated that the [REDACTED] only

said that the [REDACTED] would increase maintenance on the [REDACTED] without addressing how the [REDACTED] and what [REDACTED] for [REDACTED] maintenance would be necessary to guarantee the [REDACTED] 7C

#### Discussion

The inspector reviewed the licensee's engineering evaluation in the PCR for the potential detrimental effect of [REDACTED] 7C

The PCR [REDACTED] contained a recommendation that additional inspections be performed on these valves so that the impact of reduced [REDACTED] can be monitored. The inspector discussed the program to monitor these [REDACTED] with engineering personnel responsible for the inservice inspection program. These discussions disclosed that the [REDACTED] have been included in an increased [REDACTED] program. The [REDACTED] specifies that the [REDACTED] of the [REDACTED] system be inspected each refueling outage. The inspector reviewed the results of the [REDACTED] inspections performed on the [REDACTED] during the September, 1995 refueling outage. No deficiencies were identified. The inspector concluded that the [REDACTED] inspections were being performed in accordance with the recommendations made by design engineers.

#### Conclusions

The concern was not substantiated. The licensee had evaluated the effect of the [REDACTED] on the [REDACTED]. The licensee has implemented an inspection program to determine the impact, if any, of the [REDACTED] 7C