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 TSON, R. A. Carolina Power & Light Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 870312 ltr re violations noted in Insp Rept
 50-400/87-06. Corrective actions: 1A Auxiliary Feedwater pump
 declared inoperable on 870112 based on review of OST-1CR7 &
 plant cooldown to Mode 4 completed on 870113.

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CP&L

Carolina Power & Light Company

HARRIS NUCLEAR PROJECT
P. O. Box 165
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APR 10 1987

File Number: SHF/10-13510E
Letter Number: HO-870400 (O)

NRC-548

Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen: .

In reference to your letter of March 12, 1987, referring to I.E. Report RII: 50-400/87-06, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

It is considered that the corrective actions taken are satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Very truly yours,

R. A. Watson

R. A. Watson
Vice President
Harris Nuclear Project

RAW:sdg

Attachment

cc: Messrs. B. C. Buckley (NRC)
G. Maxwell (NRC-SHNPP)
Dr. J. Nelson Grace (NRC)

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Reported Violation:

Technical Specification 4.0.5 requires that inservice testing of ASME Code Classes 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. Subsection IWP-3220 of Section XI requires that all test data shall be analyzed within 96 hours after completion of a test.

Contrary to the above, analysis of test data for Section XI inservice test was not analyzed within 96 hours in that test data for Operational Surveillance OST-1087, performed on December 31, 1986 to obtain baseline data for the "A" Auxiliary Feedwater Pump, was not evaluated until 12 days later on January 12, 1987, resulting in the pump being declared inoperable.

This is a Severity Level IV violation (Supplement 1).

Denial or Admission and Reason for The Violation:

The violation is admitted. OST-1087 (Motor Driven Auxiliary Feedwater Pumps Full Flow Test 18 Month) was performed on December 31, 1986, for the first time and therefore had no acceptance criteria stated in the procedure. Since there was no acceptance criteria established to compare the test results to, the OST was indicated as satisfactory by the Shift Foreman. The In-Service Inspection (ISI) group received the test for evaluation on January 5, 1987, but a review was not performed until January 12, 1987.

At the time of the review it was discovered that it was a first run OST without acceptance criteria. After performing an engineering evaluation the test data taken was determined to be unsatisfactory and the 1A Auxiliary Feedwater (AFW) pump was declared inoperable.

Procedure ISI-800 (In-Service Testing of Pumps) requires that all test data be analyzed within 96 hours after completion of a test, yet this requirement was not met as stated above.

Corrective Steps Taken and Results Achieved:

The 1A AFW pump was declared inoperable on January 12, 1987, based on the review of OST-1087. The plant cooldown to Mode 4 was completed on January 13, 1987. After corrective actions were taken to repair the pump, OST-1087 was successfully completed and 1A AFW Pump was declared operable at 0833 on January 17, 1987.

Corrective Steps Taken to Avoid Further Noncompliance:

CP&L will assure that OST test data is analyzed within 96 hours after the completion of a test. This will be accomplished by the following steps:

- a. OSTs will have acceptance criteria specified so that an analysis can be accomplished by the Shift Foreman when comparing the test results against the acceptance criteria.
- b. The ISI group will check the status of OSTs on a daily basis.
- c. The ISI group will review all test data to detect adverse trends and establish new reference values as required.
- d. The ISI group will review future OST schedules to be aware of upcoming required tests.

Plant management will continue to evaluate this matter and further improvements may be made.

Date When Full Compliance Was Achieved:

Full compliance was achieved on March 1, 1987.

