

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 AUTH. NAME AUTHOR AFFILIATION
 WATSON, R. A. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 870421 ltr re violations noted in Insp Rept
 50-400/87-04. Corrective actions: wkly & monthly audits
 required by Procedure AP-20 conducted.

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NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

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MAY 21 1987

File Number: SHF/10-13510E
Letter Number: HO-870430 (0)

NRC-556

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

Gentlemen:

In reference to your letter of April 21, 1987, referring to I.E. Report RII: 50-400/87-04, 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
Vice President
Harris Nuclear Project

RAW:lmj

Attachment

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

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PDR ADDCK 05000400
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Reported Violation:

Technical Specification 6.8.1 requires that procedures be implemented in accordance with Regulatory Guide 1.33, Rev. 2, 1978, Appendix "A". Appendix "A", Item 1.C recommends procedures for equipment control (i.e., locking and tagging) and Section 9.e. recommends procedures for control of work and clearances. Shearon Harris procedure AP-20 requires control of the processing of clearances including review and approval, placement and removal of tags, documentation of actions, and verification of proper system alignment following completion of work or cancellation of the clearance.

Contrary to the above, on January 8, 1987, the steam dump valves failed to operate on demand from the control room. The licensee subsequently determined that a control circuit breaker was unknowingly left tagged out and could produce no supporting documentation. The licensee believes the clearance was cancelled, but failed to follow the procedure in documenting the disposition, removing the tag, and restoring the equipment to operation. As a result, the steam dump valves remained inoperable from November 1986 to January 1987.

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

Denial or Admission and Reason for The Violation:

The violation is correct as stated. On January 8, 1987 with the Main Steam Isolation Valves (MSIV's) shut, there was an attempt to operate the Steam Dump System. The purpose of the attempted operation was to exercise the steam dump valves prior to opening the MSIVs. The steam dump valves failed to operate on demand. Subsequent investigation found that a breaker had been tagged under clearance (No. OP-86-4575) in the de-energized position which resulted in no control power supply to the steam dump valves. After a thorough investigation, no further record or reason for the clearance could be found. The clearance tag was removed and the breaker returned to the energized position; thus, the steam dump valves were returned to service.

Corrective Steps Taken and Results Achieved:

Based on review of the Clearance Log, it was determined that clearance tag No. OP-86-4575 was hung in November, 1986. It should be noted that although the steam dumps were not operable between November, 1986 to January 8, 1987, the MSIVs were shut and thus operation of the Steam Dump System was not required.

Corrective Steps Taken and Results Achieved: (continued)

A search which included the records vault and operation's clearance books, failed to produce any further documentation or record of clearance No. OP-86-4575. Weekly and monthly audits as required by procedure AP-20 have been conducted, which includes approximately 1450 clearances issued after No. OP-86-4575, without identifying a problem with missing clearances. The plant has been operated at 100% power and no more unknown clearance tags have been identified on systems being put into operation.

Corrective Steps Taken to Avoid Further Noncompliance:

Procedure OMM-014 (Operations - Operation of the Clearance Center) was approved on January 23, 1987. This procedure details how to process clearances to ensure that a similar event will not occur.

Date When Full Compliance Was Achieved:

Full compliance was achieved on January 23, 1987.