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

SUBJECT: Responds to NRC 880115 ltr re violations noted in Insp Rept 50-400/87-38. Corrective actions: data sheets completed as required to indicate that injector orifice measurements not taken during performance of test.

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NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

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FEB 12 1988

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NRC-605

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

Gentlemen:

In reference to your letter of January 15, 1988, referring to I.E. Report RII: 50-400/87-38, the attached is Carolina Power & Light Company's reply to violation "B" 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 Plant

MGW:mdt

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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Attachment to CP&L Letter of Response to NRC I.E. Report RII:  
50-400/87-38 Violation "B"

Reported Violation:

B. 10 CFR 50, Appendix B. Criterion V, and the licensee's accepted QA program (FSAR Section 17.2.5) collectively require that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with those instructions, procedures, or drawings.

1. Maintenance Surveillance Test (MST) M0016, Emergency Diesel Generator Fuel Injection Nozzle Inspection and Cleaning, Revision 1, dated October 22, 1987, requires that: (4.2.1) "All procedure steps normally shall be performed in sequence. If a change in sequence for a particular job is needed or desired, the maintenance foreman or his designee will approve and the lead craftsman will annotate the field copy of the procedure to show the new sequence. Depending on the conditions which warranted the change, the lead craftsman should consider submitting a maintenance feedback report (FBR) for a procedure revision."

Contrary to the above, while performing MST-M0016 on both the A & B train of the diesel generator several steps of the test were not performed and were not properly documented.

2. Administrative Procedure (AP) AP-007, Revision 5, Temporary and Advance Changes to Plant Procedures, dated June 6, 1987, requires that: (5.1) temporary changes are to be used to correct procedures when the changes do not affect the intent of the original procedure. Examples of appropriate use for temporary changes are:

A plant condition or mode temporarily deviates from that for which the procedure would normally be used.

An error or omission needs to be corrected in order to use the procedure.

Contrary to the above, while performing Engineering Surveillance Test Procedure (EST) 204, Reactor Coolant System Isolation Valve Test, on July 21, 1987, changes to the procedure were accomplished without obtaining proper approval.

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

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Denial or Admission and Reason for the Violation:

The violation is correct as stated.

1. The violation occurred because the two mechanics who performed MST-M0016 were not aware of the documentation requirements relative to the omission of steps in the procedure. The intent of performing MST-M0016 did not include that the injector orifice measurements be taken at this time, therefore, the associated steps were omitted during the performance of the test, yet the omission was not documented as required by section 4.2.1 of MST-M0016.
2. The individual responsible for the subject changes to EST-204 was not aware that providing additional direction in the procedure without initiating a temporary or advance change was in violation of AP-007.

Corrective Steps Taken and Results Achieved:

1. The subject MST-M0016 data sheets were completed as required to indicate that the injector orifice measurements were not taken during performance of the test. The deferral of taking the injector orifice measurements was concurred with by the vendor. No instances of recording test data for portions of the test not performed were noted.
2. The responsibility for performance of the Reactor Coolant System Isolation Valve Testing has been transferred from the Technical Support group to the Operations group. EST-204 has been superseded by OST-1506 and the subject changes have been incorporated as deemed necessary.

Corrective Steps Taken To Avoid Further Violations:

1. The two maintenance personnel involved were specifically counseled regarding the incident. Appropriate maintenance personnel have been reminded of the necessity for strict adherence to procedures.
2. Appropriate personnel have been reminded on the requirements of AP-007, specifically that if a change which provides any degree of direction in performance of the procedure is desired, a temporary or advance change shall be initiated in accordance with AP-007.

Date When Full Compliance Was Achieved:

Full compliance was achieved on February 12, 1988, upon completion of the actions taken as described above.