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 WATSON,R.A. Carolina Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 880804 ltr re violations noted in Insp Rept  
 50-400/88-20. Corrective actions: change to OST-1015 approved.

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NOTES: Application for permit renewal filed. 05000400

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**Carolina Power & Light Company**

HARRIS NUCLEAR PROJECT  
P. O. Box 165  
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SEP 02 1988

File Number: SHF/10-13510E  
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NRC-639

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SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400  
LICENSE NO. NPF-63  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In reference to your letter of August 4, 1988, referring to I.E. Report RII: 50-400/88-20, 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

MGW:dj

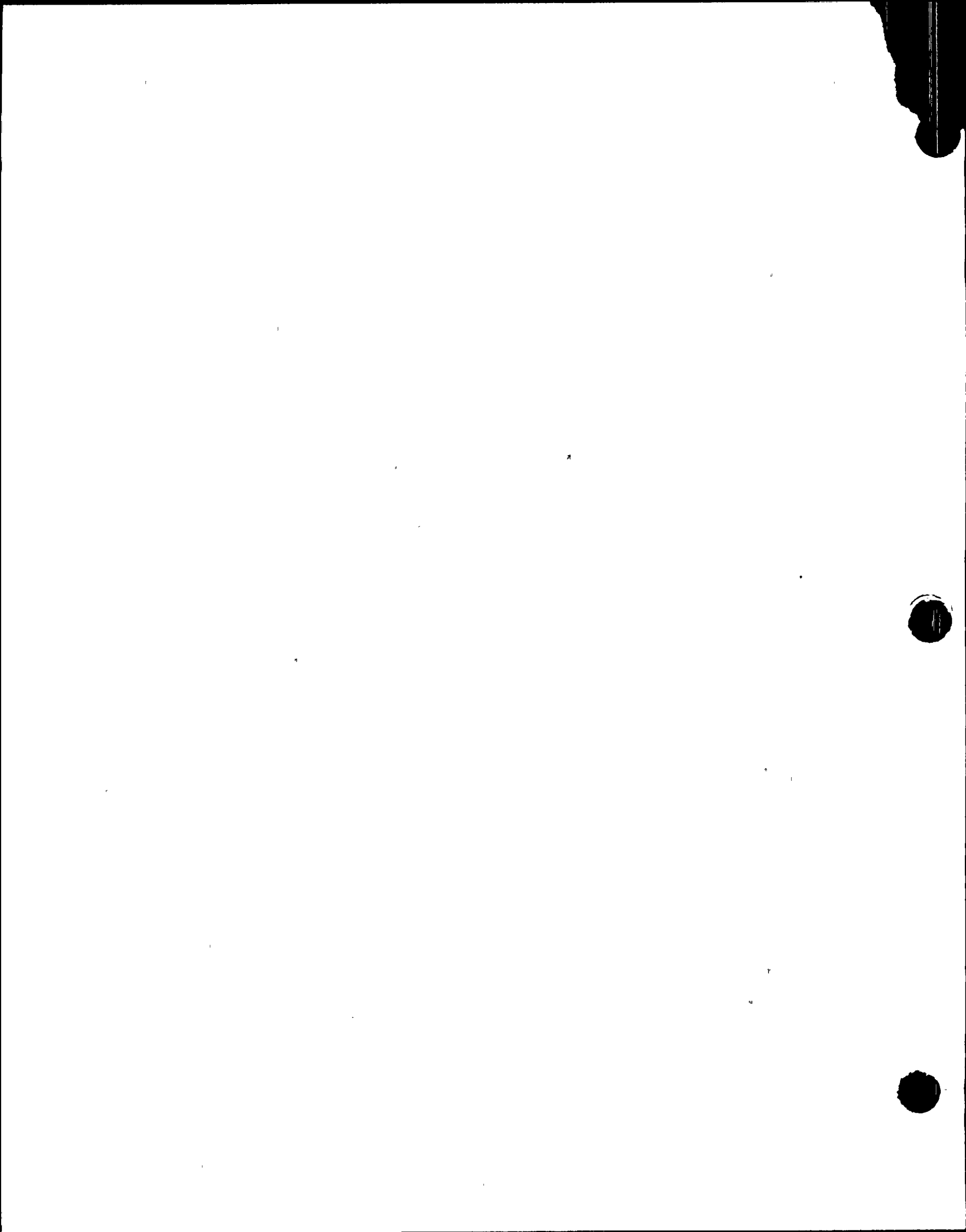
Attachment

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

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Attachment to CP&L Letter of Response to NRC I.E. Report RII:  
50-400/88-20 Violation

Reported Violation:

Technical Specification 4.7.4a requires that at least two emergency service water loops be demonstrated operable at least once per 31 days by verifying that each valve servicing safety-related equipment, that is not locked, sealed, or otherwise secured in position, is in its correct position.

Contrary to the above, the two emergency service water loops were not demonstrated operable at least once per 31 days, in that charging pump cooling supply valves 1SW-1430, 1431, 1432, 1433, 1434, and 1435 were not included in the monthly surveillance and therefore the correct positions were not verified.

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

Denial or Admission and Reason for the Violation:

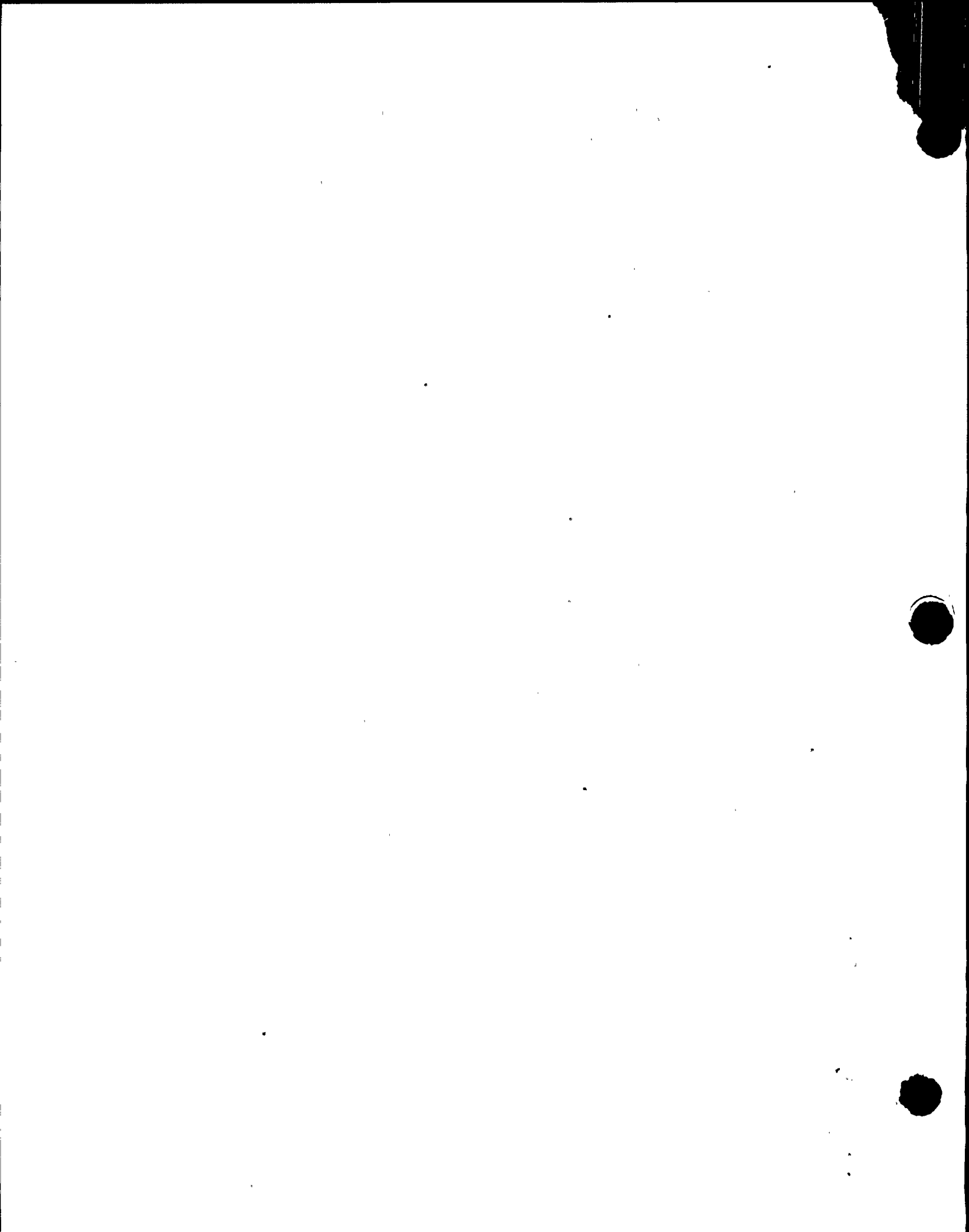
The violation is correct as stated.

In October 1986, Operations personnel initiated Plant Change Request (PCR) 000508 which identified that the subject skid mounted valves did not appear on the applicable design drawings. The PCR requested that the valves be assigned valve numbers and be shown on drawing SFD 2165-S-0547. PCR-000508 was approved and SFD 2165-S-0547, Rev. 10 (2165-G-047, Rev. 21) was approved on January 29, 1987, which incorporated valves 1SW-1430, 1431, 1432, 1433, 1434 and 1435.

During a revision of OP-139, "Service Water System" operating procedure, it was discovered that the subject valves were not included. The valves were included and OP-139, Rev. 3, was approved on February 3, 1988. Operations personnel overlooked the need to also include the subject valves into the monthly operability surveillance procedure (OST-1015). Based on further review of the incident, it has been determined to be an isolated case.

Corrective Steps Taken and Results Achieved:

A change to OST-1015 was approved on July 13, 1988. This change added the missed valves to the monthly surveillance. The subject valves were found to be in the proper position when checked.



Attachment to CP&L Letter of Response to NRC I.E. Report RII:  
50-400/88-20 Violation (continued)

Corrective Steps Taken to Avoid Further Noncompliance:

A review was conducted of the remaining monthly valve verification OSTs against system design drawings to ensure valves were included. Operations personnel conducted walkdowns of these same systems to verify that the remaining skid mounted valves were identified on system design drawings. No additional problems were found.

Date When Full Compliance Was Achieved:

Full compliance was achieved on July 13, 1988 with the completion of the actions described above.