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SUBJECT: Responds to NRC 881025 ltr re deviations noted in Insp Rept 50-400/88-29.

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File Number: SHF/10-13510E
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United States Nuclear Regulatory Commission
Washington, DC 20555

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

Gentlemen:

In reference to your letter of October 25, 1988, referring to I.E. Report RII: 50-400/88-29, the attached is Carolina Power & Light Company's reply to the deviation identified in the enclosure.

It is considered that the actions taken are satisfactory for resolution of this matter.

Thank you for you consideration in this matter.

Very truly yours,

C S Hinnant (for)

R. A. Watson
Vice President
Harris Nuclear Project

MGW:crc

Attachment

cc: Messrs. W. H. Bradford (NRC-SHNPP)
B. C. Buckley (NRC)
M. L. Ernst (NRC)

IE01
1/1

MEM/HO-8802360/1/OS1

Reported Deviation:

Shearon Harris Nuclear Power Plant (SHNPP) FSAR, Section 1.8 - Conformance to NRC Regulatory Guides states: "...SHNPP complies with IEEE Standard 338-1977, Reg. Guide 1.118."

IEEE Standard 338-1977 requires, in part, that a test program be implemented that produces objective data for evaluating (assessing) the performance and availability of the component being tested, and that the data be trended to allow for the detection of degradation and indication of incipient failures.

Contrary to the above, on September 1, 1988, 27 of 50 Maintenance Surveillance Tests that were reviewed contained as found data that was outside of its allowable range. The licensee did not have a program to evaluate the out-of-range readings, nor was there a program to trend instrument drift as required by the above.

Reason for the Deviation:

CP&L agrees that a formal program to comply with the evaluation and trending requirements for instrumentation calibration was not in place at the time of the inspection. However, CP&L disagrees that the 27 items noted required evaluation under such a program.

This is best explained by the definitions used in instrument calibrations. The following definitions are provided to clarify this:

1. Allowable Range: The tolerance used in calibration procedures (less than or equal to the allowable limit).

2. Allowable Limit: The tolerance specified in the design set point document.

3. Allowable Value: The Tech. Spec. value which a set point must trip before to remain within Westinghouse set point margin allowances.

4. Tech. Spec. Limit: Total allowance as defined in Tech. Spec.

Twenty-seven out of fifty Maintenance Surveillance test calibration procedures, "as found" values, were found outside of the "allowable range" but not outside the "allowable value". The Westinghouse set point study addresses instrument drift and this basis is incorporated in the set point document. From the set point listed in the Technical Specification the "allowable value" has been established. In the majority of the cases, SHNPP intentionally made tolerance bands or "allowable range" more conservative than the "allowable limit" which reduces the possibility of exceeding the "allowable limits" or Technical Specification "allowable value." Due to this fact, we do not trend those devices that are outside of the "allowable range."

Not withstanding the lack of a formal program, when instruments were found outside of the "allowable value," in particular, two separate episodes of Pressurizer Pressure Transmitter drift, the situation was evaluated.

Corrective Steps Taken and Results Achieved:

Since the twenty-seven as found values identified were outside of the "allowable range" but not outside of the "allowable value" trending was not performed.

Corrective Steps Taken to Avoid Further Deviations:

The existing program will be modified to "evaluate" and "trend" those devices found out of the "allowable value" criteria. These program changes are projected to be completed by March 1, 1989.

In the interim, instructions will be issued to appropriate maintenance personnel requiring that when readings exceed the "allowable value," maintenance engineering is to be notified to perform an evaluation. This action will be completed by December 2, 1988.

Date When Corrective Action will be Completed:

Corrective action is projected to be complete by March 1, 1989.