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SUBJECT: Responds to NRC 881031 ltr re violations noted in Insp Rept 50-440/88-33.

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CP&L

Carolina Power & Light Company

NOV 29 1988

**HARRIS NUCLEAR PROJECT
P. O. Box 165
New Hill, North Carolina 27562**

File Number: SHF/10-13510E
Letter Number: HO-880237 (0)

NRC-652

Document Control Desk
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 VIOLATION**

Gentlemen:

In reference to your letter of October 31, 1988, referring to I.E. Report RII: 50-400/88-33, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

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

Thank you for your consideration in this matter.

Very truly yours,

C. Stinnant for

R. A. Watson
Vice President
Harris Nuclear Project

MGW:tbb

Attachment

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

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Attachment to CP&L Letter of Response to NRC I.E. Report RII:
50-400/88-33 Violation

Reported Violation:

Technical Specification 6.8.1.h requires that applicable written procedures be established, implemented, and maintained for the fire protection program.

1. Plant Fire Protection Program Procedure FPP-013, "Fire Protection Minimum Requirements and Mitigating Actions," requires the licensee to establish hourly fire watch patrols in areas where equipment is required to be operable when fire barriers are degraded.

Contrary to the above, between September 2, 1988, and September 10, 1988, there were eight recorded occurrences where hourly fire watch patrols were not performed in the "B" diesel generator building when the "B" diesel generator was required to be operable and fire barriers were degraded.

2. Operations Management Manual Procedure OMM-033, "Equipment Inoperable Record," requires the licensee to complete an equipment inoperable record form and to immediately deliver it to the shift foreman for his evaluation of equipment operability when a fire protection component becomes inoperable.

Contrary to the above, on September 9, 1988, a three hour and a one hour fire barrier in the "B" diesel generator building were found to be breached and were, therefore, inoperable; but an equipment inoperable record had not been completed as required.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

1. Fire watch personnel were aware of their responsibilities, but failed to recognize the seriousness and consequences of noncompliance. The problem with fire watch personnel making improper inspections was previously identified by the licensee and aggressive action to correct the problem is being pursued.



2.



2. The fire barriers noted by the inspector were breached as stated but the specific reason for the discrepancy was not apparent. Work had been performed recently for which cables were routed through the barrier penetrations, but since the penetrations were already open prior to the work, personnel did not realize that it was a fire barrier which was required to be sealed and therefore the discrepancy was not identified and corrected.

Corrective Steps Taken and Results Achieved:

1. Fire watch personnel were cautioned on the seriousness of not complying with hourly fire watch requirements. Disciplinary action has been taken against the individuals involved which included five terminations.
2. As soon as the potential violation was brought to the attention of Operations, an Equipment Inoperable Record (EIR) was initiated and a fire watch assigned in accordance with plant procedures. In addition, a site Nonconformance Report (NCR-88-083) was initiated.

Corrective Steps Taken to Avoid Further Violations:

1. An electronic key system has been installed and patrol area maps provided to fire watch personnel. The electronic key system provides a method of verifying that areas requiring a fire watch are visited by fire watch personnel and documents the time. Use of the system provides prompt, accurate feedback on the performance of the fire watch personnel. If discrepancies are found, the matter is investigated and if required, disciplinary action is taken. As noted in the Inspection Report 88-33, this system was implemented prior to the issuance of the violation.

The fire watch program has been supplemented since the issuance of the violation with a revised pay scale for the fire watch personnel. The previous pay scale did not provide any pay incentives for better performers. This has been changed to allow more pay for those personnel who have demonstrated consistent, reliable performance and thereby increases the overall reliability of the program.

2. In the past 11 months, three 10 percent samples of fire penetrations have been inspected. Each 10 percent sample (680 penetrations) has revealed approximately 5-6 percent failures. The majority of the failures are the result of improper initial installation and inspection. As a result, the decision has been made to perform a 100 percent inspection (6800 penetrations). It is felt that the penetration problem will then be resolved. This inspection is expected to be completed by December 31, 1989.



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Date When Full Compliance will be Achieved:

1. Full compliance was achieved on November 1, 1988.
2. Full compliance is pending the 100 percent inspection and any required rework of penetrations. This is expected to be completed by December 31, 1989.

