

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SESSION NBR: 8901030237      DOC. DATE: 88/12/21      NOTARIZED: NO      DOCKET #  
 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina      05000400  
 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 881122 ltr re violations noted in Insp Rept 50-400/88-34.

DISTRIBUTION CODE: IE01D      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 3  
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: Application for permit renewal filed. 05000400

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD2-1 PD	1 1	BUCKLEY, B	1 1
INTERNAL:	ACRS	2 2	AEOD	1 1
	AEOD/DEIIB	1 1	DEDRO	1 1
	NRR SHANKMAN, S	1 1	NRR/DLPQ/PEB 11	1 1
	NRR/DLPQ/QAB 10	1 1	NRR/DOEA DIR 11	1 1
	NRR/DREP/EPB 10	1 1	NRR/DREP/RPB 10	2 2
	NRR/DRIS DIR 9A	1 1	NRR/PMAS/ILRB12	1 1
	NUDOCS-ABSTRACT	1 1	OE LIEBERMAN, J	1 1
	OGC/HDS1	1 1	<u>REG-FILE</u> 02	1 1
	RGN2 FILE 01	1 1		
INTERNAL:	LPDR	1 1	NRC PDR	1 1
	NSIC	1 1	RESL MARTIN, D	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE!      CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 25 ENCL 25

R  
I  
D  
S  
/  
A  
D  
D  
S



Carolina Power & Light Company

DEC 21 1988

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

File Number: SHF/10-13510E  
Letter Number: HO-880246 (0)

NRC-655

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 November 22, 1988, referring to I.E. Report RII: 50-400/88-34, the attached is Carolina Power and Light Company's reply to violation "A" 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,

R. A. Watson  
Vice President  
Harris Nuclear Project

MGW:tbb

Enclosure

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

8901030237 881221  
PDR ADCK 05000400  
Q PDC

MEM/HO-8802460/1/OS1

IEO1  
11



Attachment to CP&L Letter of Response to NRC I.E. Report RII:  
50-400/88-34 Violation "A"

Reported Violation:

Technical Specification 6.2.2.f requires that administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions, including key maintenance personnel. Deviations from guideline limits are required to be authorized by the plant general manager or his designee, with documentation of the basis for granting the deviation. The guideline limits on work hours include: 24 hours in any 48 hour period, and 72 hours in any 7 day period.

Contrary to the above, guideline limits on work hours for key maintenance personnel were exceeded without the required authorization during the period of July 30, 1988, through September 16, 1988. Noted were twenty-two instances of exceeding the limit of 72 hours in any 7 day period, and 12 instances of exceeding the limit of 24 hours in any 48 hours.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The violation occurred due to the lack of awareness by some personnel of the requirements of Technical Specification 6.2.2.f and Procedure MMM-001, Maintenance Conduct of Operation, concerning limits on overtime.

Corrective Steps Taken and Results Achieved:

A review was conducted of recent maintenance overtime. Discrepancies were identified to the Plant General Manager and subsequent approval was documented.

Corrective Steps Taken to Avoid Further Violation:

Maintenance foremen have received additional training on Technical Specification and MMM-001 requirements for overtime. A memorandum was issued by the maintenance manager to maintenance personnel reminding them of their responsibilities for ensuring proper approval of overtime. MMM-001 will be revised to require that maintenance supervisors conduct monthly reviews of overtime. Signs will be posted in maintenance shops to remind personnel of overtime approval requirements.

Date When Full Compliance Will Be Achieved:

Full compliance is pending revision to MMM-001 to include the maintenance supervisory review and posting of signs in the maintenance shops as stated above. These actions are expected to be completed by January 31, 1989.