

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

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 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina      05000400  
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 WATSON, R.A.      Carolina Power & Light Co.  
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SUBJECT: Responds to NRC 890303 ltr re violations noted in Insp Rept 50-400/88-40.

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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  
New Hill, North Carolina 27562

MAR 29 1989

File Number: SHF/10-13510E  
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NRC-662

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 March 3, 1989, referring to I.E. Report RII: 50-400/88-40, the attached is Carolina Power and Light Company's reply to violation "B" 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. R. A. Becker (NRC)  
Mr. W. H. Bradford (NRC - SHNPP)  
Mr. S. D. Ebnetter (NRC - RII)

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Attachment to CP&L Letter of Response to NRC I.E. Report RII:  
50-400/88-40 Violation "B"

Reported Violation:

Technical Specification 6.8.1a requires that written procedures be implemented covering the procedures outlined in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978. Administrative Procedures are identified in Appendix A of the Regulatory Guide. Administrative Procedure 002, Rev. 3, Section 5.4, entitled, "Plant Conduct of Operations," requires that adherence to procedures shall be mandatory.

Administrative Procedure 020, Rev. 2, Section 5.2, entitled "Clearance Procedure," requires that when removing a clearance, remove tags from handwheels of all valves, as required, and reposition manual valves as directed in the restoration line up.

Contrary to the above, on January 17, 1989, at 2:15 a.m., the valve realignment instruction in clearance OP-89-0071 was not followed in that valve 1SF-19 was required to remain closed. Valve 1SF-19 was opened which allowed approximately five feet of water in the spent fuel pool to drain into the new fuel storage pool.

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

Denial or Admission and Reason for the Violation:

The violation is admitted.

The clearance removal sequence required valve 1SF-19 be checked closed before reopening valve 1SF-11 (see attached sketch) thus ensuring no potential for water intrusion into the New Fuel Pool. These valves are in the overhead about 11 feet above the floor in a dimly lit area. The operator must either obtain a ladder to gain access to the valve or climb the piping. Ladders are available in the general area and the operators who placed the clearance used a ladder for access. The operator who removed the clearance chose to climb the piping to gain access to the valve. This required that he operate the valve from above the handwheel and turn the handwheel from an awkward position. The operator could not observe the mechanical position indicator on the valve, while he was physically operating the handwheel. He could not cause the handwheel to turn; therefore, he assumed that the valve was shut. This method of verifying a valve in the shut position is consistent with plant procedures. He then proceeded to open 1SF-11. This allowed water to flow from the Spent Fuel Pool to the New Fuel Pool. The loss of water could not be immediately detected by the operator because of the ambient noise in the Spent Fuel Pool Cooling Heat Exchanger room.

Denial or Admission and Reason for the Violation: (continued)

The reason for the event was the incorrect determination of valve position during the process of removing a clearance. Valve 1SF-19 was verified closed when the clearance was placed. Valve 1SF-19 was open when the clearance was removed. The operator who removed the clearance did not change the position of the valve. Operating logs and similar records were reviewed for evidence of circumstances that would suggest a reason for the change in valve position, but no explanation has yet been found. An investigation of the change in the position of 1SF-19 is currently in progress.

(For further details see LER 89-002-00).

Corrective Steps Taken and Results Achieved:

Valve 1SF-19 was shut by operations personnel approximately ten minutes after the event was initiated. The spent fuel pool level was restored to normal level by 8:15 a.m. on January 17, 1989.

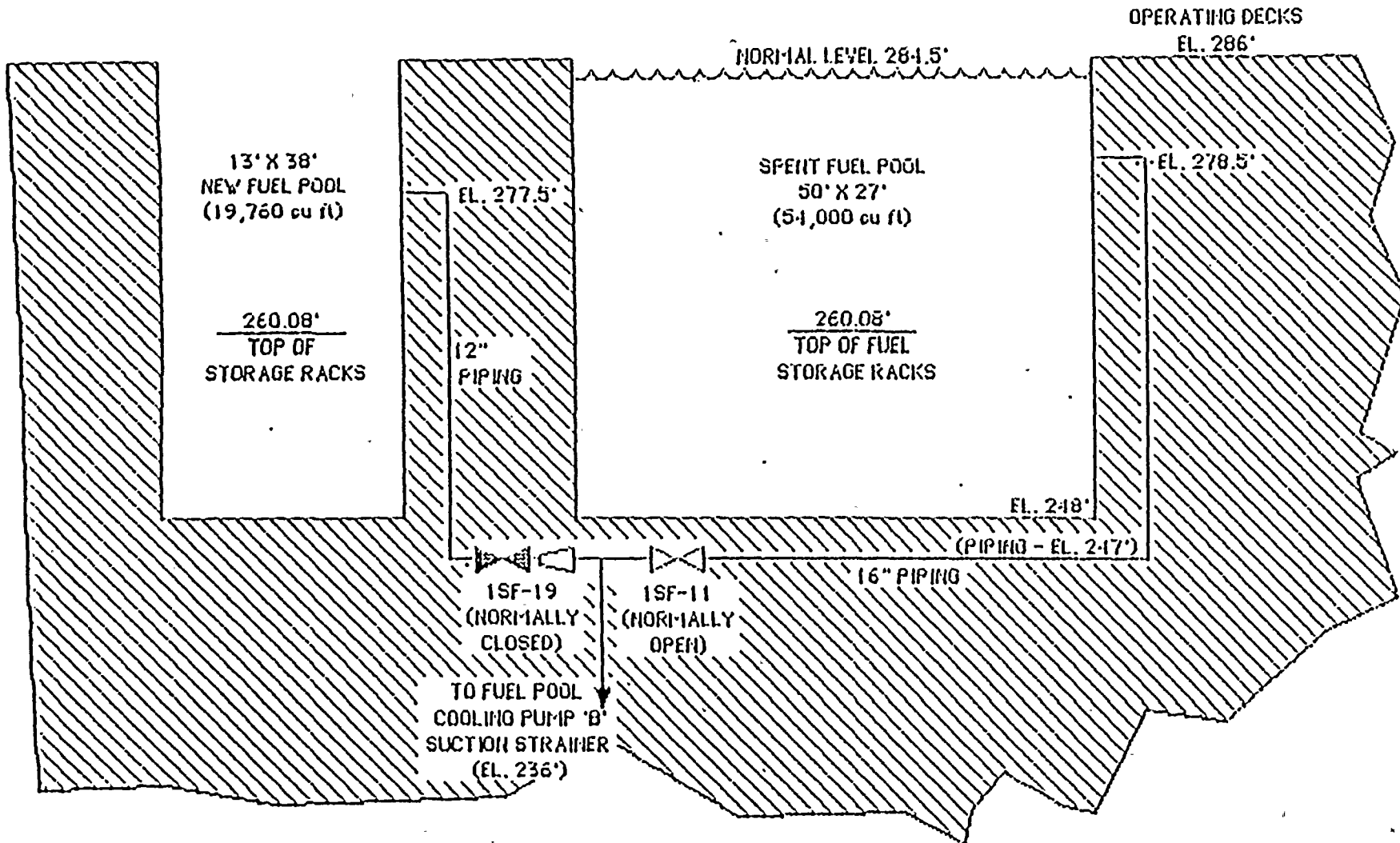
Corrective Steps Taken to Avoid Further Violations:

Personnel involved in this event were counseled and disciplinary action was taken. Appropriate operations personnel received training on the proper methods and cautions to be used when determining a valve's position. The event continues to be investigated to determine the cause of valve 1SF-19 being mispositioned.

Date When Full Compliance will be Achieved:

Full compliance is pending completion of the ongoing investigation. It is currently projected that the investigation will be complete by May 26, 1989.

# FUEL POOL PIPING



FUEL POOL PIPING-ATT A/M&MS