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 RICHEY, R.B. Carolina Power & Light Co.
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SUBJECT: Responds to NRC 890821 ltr re violations noted in Insp Rept 50-400/89-15.

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Carolina Power & Light Company

HARRIS NUCLEAR PROJECT
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SEP 1 2 1989

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

NRC-680

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 21, 1989, referring to I.E. Report RII: 50-400/89-15, 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. B. Richey, Manager
Harris Nuclear Project

MGW:djs

Enclosure

cc: Mr. R. A. Becker (NRC)
Mr. S. D. Ebnetter (NRC - RII)
Mr. M. C. Shannon (NRC - SHNPP)

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ATTACHMENT TO CP&L LETTER OF RESPONSE TO NRC I.E.

REPORT RII: 50-400/89-15 VIOLATION "B"

Reported Violation:

10 CFR 50 Appendix B, Criterion V, Instructions, Procedures, and Drawings, and the Carolina Power and Light Company Corporate Quality Assurance Program, Section 6, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings and shall be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, activities affecting quality were not accomplished in accordance with instructions, procedures, or drawings in that the containment spray system NAOH tank outlet flow orifice, FE 7152, was installed backwards while performing maintenance Work Request 86-AGQM1, and the QC hold point for verification of flow direction was initialed as acceptable.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

Both the maintenance installation and the QC inspection are considered to be contributors to the violation.

On May 30, 1986, Maintenance reinstalled the Containment Spray System Sodium Hydroxide Tank outlet flow orifice, FE-7152. Work was controlled under WR&A 86-AGQM1. A "Start-Up Flanged Connection Form" was used as the process control document, and QC Holdpoints were assigned. The process control document also referenced applicable information such as line number, drawing number, and code class.

The reason for the improper installation of the flow orifice by maintenance personnel cannot be determined. The personnel involved are no longer employed at the Harris Nuclear Project. The flow orifice handle was clearly marked for installation purposes. Proper orientation and post installation verification should not have been a problem.

During reinstallation, the QC Inspector was to verify "Valve/Speciality Item Flow Direction", as well as mating surfaces, gaskets, fasteners, lubricant and torque. Inspection results and other pertinent information were recorded on the process control document. A review of this document indicates that holdpoints were initialed as acceptable.

The flow element was clearly marked to indicate flow direction, and the referenced isometric drawing correctly showed the flow direction. To the assigned inspector, who was fully qualified and certified, this would have been a routine inspection. Therefore, it is concluded that error on the part of the QC Inspector is a contributing cause to the improper installation of the flow element.

Corrective Steps Taken and Results Achieved:

Maintenance work request 89-ALTG1 was generated to remove, inspect, and reinstall the flow element in the proper orientation. On August 8, 1989, the system flow element was isolated, the flange disassembled, and the flow element was removed and inspected. It was found to be installed backwards. The flow orifice was reinstalled with appropriate QC verifications.

The QC Inspector involved is no longer employed by the Company. QA/QC is currently identifying other inspections performed by this Inspector for purposes of reinspection. Reinspection will be performed until a satisfactory confidence level is achieved. This reinspection effort is currently in progress and, to date, no other problems have been identified. This effort is expected to be completed by January 29, 1990.

Corrective Steps Taken to Avoid Further Violations:

Maintenance Mechanics are required to attend Continuing Training classes quarterly. The training is conducted by the Harris Training Unit at the Harris Plant. In the fourth quarter of 1989, this training will include a session on flow measurement devices. The training will include discussions on flow element orientation in a flow stream. This training is expected to be completed by October 31, 1989.

A training class will be held for certified QC Mechanical Inspectors. This training will cover flow elements, flow paths, and attention to detail when performing inspections. This training is expected to be completed by October 2, 1989.

Date When Full Compliance Will be Achieved:

Full compliance is pending the completion of the above mentioned training for both maintenance and QC personnel and the reinspection effort which is expected to be completed by January 29, 1990.

