

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8909250246 DOC.DATE: 89/09/20 NOTARIZED: NO DOCKET #  
 FACIL:50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400  
 AUTH.NAME AUTHOR AFFILIATION  
 SCHWABENBAUER Carolina Power & Light Co.  
 RICHEY,R.B. Carolina Power & Light Co.  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 89-014-00:on 890821,two high point ECCS vents not tested  
 as required due to procedural deficiencies.

W/8 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:Application for permit renewal filed.

05000400

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	ACRS WYLIE	1 1	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
	DEDRO	1 1	IRM/DCTS/DAB	1 1
	NRR/DEST/CEB 8H	1 1	NRR/DEST/ESB 8D	1 1
	NRR/DEST/ICSB 7	1 1	NRR/DEST/MEB 9H	1 1
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	NRR/DEST/RSB 8E	1 1	NRR/DEST/SGB 8D	1 1
	NRR/DLPQ/HFB 10	1 1	NRR/DLPQ/PEB 10	1 1
	NRR/DOEA/EAB 11	1 1	NRR/DREP/RPB 10	2 2
	NUDOCS-ABSTRACT	1 1	REG FILE 02	1 1
	RES/DSIR/EIB	1 1	RGN2-FILE 01	1 1
EXTERNAL:	EG&G WILLIAMS,S	4 4	L ST LOBBY WARD	1 1
	LPDR	1 1	NRC PDR	1 1
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Carolina Power & Light Company

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

SEP 20 1989

File Number: SHF/10-13510C  
Letter Number: HO-890095 (0)

U.S. Nuclear Regulatory Commission  
ATTN: NRC Document Control Desk  
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1  
DOCKET NO. 50-400  
LICENSE NO. NPF-63  
LICENSEE EVENT REPORT 89-014-00

Gentlemen:

In accordance with Title 10 to the Code of Federal Regulations, the enclosed Licensee Event Report is submitted. This report fulfills the requirement for a written report within thirty (30) days of a reportable occurrence, and is in accordance with the format set forth in NUREG-1022, September 1983.

Very truly yours,

R. B. Richey, Manager  
Harris Nuclear Project

RBR:djs

Enclosure

cc: Mr. R. A. Becker (NRR)  
Mr. W. H. Bradford (NRC - SHNPP)  
Mr. S. D. Ebnetter (NRC - RII)

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PDR ADCK 05000400  
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MEM/LER-89-014/1/OS1

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11

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) SHEARON HARRIS NUCLEAR POWER PLANT - UNIT 1										DOCKET NUMBER (2) 0 5 0 0 0 4 0 0				PAGE (3) 1 OF 04		
TITLE (4) TWO HIGH POINT EMERGENCY CORE COOLING SYSTEM VENTS WERE NOT BEING TESTED AS REQUIRED DUE TO PROCEDURAL DEFICIENCIES.																
EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)						
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES				DOCKET NUMBER(S)			
08	21	89	89	014	00	09	20	89					0 5 0 0 0			
OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)														
1		20.402(b)				20.406(c)				50.73(a)(2)(iv)				73.71(b)		
POWER LEVEL (10)		20.406(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)		
1 0 0		20.406(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vi)						
		20.406(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(vii)(A)				OTHER (Specify in Abstract below and in Text, NRC Form 366A)		
		20.406(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)						
		20.406(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(ix)						
LICENSEE CONTACT FOR THIS LER (12)																
NAME RICHARD SCHWABENBAUER REGULATORY COMPLIANCE TECHNICIAN										TELEPHONE NUMBER						
										AREA CODE						
										919		362-2669				
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC						
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)												X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

The plant was operating in Mode 1, Power Operation, at 100 percent reactor power on August 21, 1989. A walkdown of the low pressure Emergency Core Cooling System (ECCS) piping and associated procedures identified two accessible discharge piping high point vents that were not being verified full of water at least once per 31 days as required by Technical Specification (TS) surveillance requirement 4.5.2.b.1. This was identified at 1100 hours on August 21, 1989. The subject vents were being tested on a quarterly basis in contrast to the required monthly frequency. The two vents were tested, and verified free of air at 1540 hours on August 21, 1989.

The cause of the event was procedural deficiency as plant procedures stated TS surveillance requirements were being satisfied, when in fact they were not.

The immediate corrective action was to verify the vents were free of air, and plant procedures are being revised to correct the deficiencies.

There were no safety consequences as a result of this event. There are five other points in the Residual Heat Removal (RHR) system which have been vented monthly, the two subject vents (one per RHR train) were being vented on a quarterly basis, and when checked on August 21, 1989, no air was detected in either line.

This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B) as a violation of Technical Specifications Action 4.5.2.b.1.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)		
SHEARON HARRIS NUCLEAR POWER PLANT		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
UNIT 1	0 5 0 0 0 4 0 0	8 9	- 0 1 4	- 0 0	0 2	OF	0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION:

The plant was operating in Mode 1, Power Operation, at 100 percent reactor power on August 21, 1989. A walkdown of the low pressure Emergency Core Cooling System (ECCS), and associated procedures identified two accessible discharge piping high point vents which were not being verified full of water at least once per 31 days as required by Technical Specification (TS) surveillance requirement 4.5.2.b.1. The two vents (one per train) are located in the Residual Heat Removal (RHR) discharge piping to the Reactor Coolant System (RCS).

This was identified at 1100 hours on August 21, 1989. The subject vents were being opened on a quarterly basis in contrast to the required monthly frequency. The two vents were then tested and verified free of air at 1540 hours on August 21, 1989.

The vent paths which were excluded from the monthly surveillance are for valves 1RH-32, and 1RH-33 (A-TRAIN), and 1RH-67, and 1RH-68 (B-TRAIN). These vents were originally included in Operating Surveillance Test Procedure (OST)-1107, ECCS Flow path and Piping Filled Verification Monthly Interval Modes 1-2-3-4, Revision 1, dated April 9, 1986. A Plant Change Request (PCR)-423 initiated September 5, 1986, added several more vent lines to both the high and low pressure ECCS discharge piping. Revision 2 to OST-1107, dated December 12, 1986, added the new vents installed by PCR-423 for monthly testing, however, it also deleted the two subject vents.

The subject vents were being tested on a quarterly basis in accordance with procedures OST-1008, RHR Pump Operability Quarterly Interval for Modes 1-2-3, and OST-1108, RHR Pump Operability Quarter Interval for Modes 4-5-6. While these two procedures' purpose statements listed 4.5.2.b.1 as being completed in the procedure, OST-1008 and OST-1108 covered only 2 of the 7 accessible vent locations identified for the RHR system. To satisfy 4.5.2.b.1 both OST-1107 and OST-1008 or OST-1108 should have been scheduled on a monthly basis. It is not clear why the vents were separated between these procedures.

Plant General Order (PGO)-031, Technical Specifications Cross Reference Index, lists OST-1008 as satisfying TS 4.5.2.b.1, and OST-1108 as satisfying TS 4.5.3.1. Surveillance 4.5.3.1 is a surveillance specification that simply references all of the 4.5.2 surveillances as being necessary for operability in Mode 4. PGO-031 is also in error because of the information provided in the purpose section of OST-1008 and OST-1108.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)
SHEARON HARRIS NUCLEAR POWER PLANT		YEAR SEQUENTIAL NUMBER REVISION NUMBER	
UNIT 1	0 5 0 0 0 4 0 0 8 9	- 0 1 4 - 0 0 0 3	OF 0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION: (continued)

A review of the high pressure ECCS discharge piping high point vents was conducted to verify/determine if any similar situations existed in this system on August 22, 1989. This review identified one potential high point vent associated with the Boron Injection Tank (BIT) which is not being vented on a routine basis. An engineering evaluation was initiated August 22, 1989, to determine if this normally isolated section of the high pressure ECCS should be included in the TS 4.5.2.b.1 requirements. This evaluation is being performed by PCR-4730.

CAUSE:

The cause of the event was procedural deficiencies as plant procedures stated TS surveillance requirements were being satisfied, when in fact they were not.

An investigation was done to determine the cause of the procedure omissions. However, the cause of the error could not be determined. The procedure change was performed by contractor personnel no longer on site, and the historical file does not provide enough information to indicate why the error was made.

ANALYSIS:

There were no safety consequences as a result of this event. There are five other high point vents in the RHR system which have been tested monthly in accordance with TS requirements, and no unsatisfactory results being reported. Also, the two subject vents were being tested on a quarterly basis, and when tested on August 21, 1989, satisfactorily passed with no air being detected in either line.

This event is being reported in accordance with 10CFR50.73(a)(2)(i)(B) as a violation of Technical Specifications Action 4.5.2.b.1.

An event reported in LER-87-043-00 stated that six outside containment isolation valves were omitted from monthly surveillance tests due to procedural deficiencies. However, there were no events which involved the failure to test high point vents.

CORRECTIVE ACTION/ACTION TO PREVENT RECURRENCE:

- 1) OST-1008 is being revised to delete the reference and acceptance criteria associated with TS 4.5.2.b.1.
- 2) OST-1108 is being revised to delete the reference and acceptance criteria associated with TS 4.5.3.1.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (6)

PAGE (3)

SHEARON HARRIS NUCLEAR POWER PLANT

YEAR

SEQUENTIAL  
NUMBERREVISION  
NUMBER

UNIT 1

0 5 0 0 0 4 0 0 8 9 - 0 1 4 - 0 0 0 4 OF 0 4

TEXT (If more space is required, use additional NRC Form 368A's) (17)

- 3) PGO-031 is being revised to delete the TS reference for procedures OST-1008, and OST-1108 as required.
- 4) OST-1107 is being revised to include the two omitted vents for monthly testing.
- 5) PCR-4730 is being completed to determine if this normally isolated section of the high pressure ECCS should be included in the TS 4.5.2.b.1 requirements. Appropriate action will be taken if required.
- 6) A review will be made of quarterly OSTs which include monthly surveillances to assure that these surveillances are being adequately covered by the procedures, the scheduling process, and PGO-031.

EIIS CODE INFORMATION:

EMERGENCY CORE COOLING SYSTEM (ECCS)  
RESIDUAL HEAT REMOVAL (RHR)  
REACTOR COOLANT SYSTEM (RCS)  
BORON INJECTION TANK (BIT)

BP  
BP  
AB  
BQ