

**CP&L**

**Carolina Power & Light Company**

P. O. Box 165 • New Hill, N. C. 27562

R. B. RICHEY  
Vice President  
Harris Nuclear Project

NOV 30 1990

Letter Number: HO-900200 (0)

Document Control Desk  
United States Nuclear Regulatory Commission  
Washington, DC 20555

NRC-736

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1  
DOCKET NO. 50-400  
LICENSE NO. NPF-63  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In reference to your letter of November 2, 1990, referring to I. E. Report RII: 50-400/90-20, 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. B. Richey*  
R. B. Richey

RBR:slc

Enclosure

cc: Mr. R. A. Becker (NRR)  
Mr. S. D. Ebner (NRC - RII)  
Mr. J. E. Tedrow (NRC- SHNPP)

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ATTACHMENT TO CP&L LETTER OF RESPONSE  
TO NRC I. E. REPORT RII: 50-400/90-20

Reported Violation:

10 CFR 50.9, requires that information, required by the Commission's license conditions to be maintained by the licensee, shall be complete and accurate in all material respects.

Contrary to the above, the "A" and "B" emergency battery surveillance test, MST-E0010, Inspection of 125 VDC Emergency Battery Banks, completed on September 26, 1990, and required by Technical Specification surveillance requirement 4.8.2.1.a, was not accurate in all material respects in that the times and dates documented on the surveillance for test start and completion were inaccurate and did not identify the correct times and dates when the surveillance was performed.

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

Denial or Admission and Reason for the Violation:

The violation is admitted.

On September 25, 1990, two electricians, working a 12-hour backshift, were assigned to perform surveillance tests MST-E0010 and MST-E0011. These are the weekly and monthly surveillance tests on the 1A-SA and 1B-SB battery. MST-E0011 satisfies all requirements of MST-E0010 and the two are normally done concurrently.

The electricians took the data for MST-E0011 on the evening of September 25, 1990 then returned to the Electric Shop to complete the calculations. After they had determined that MST-E0011 was satisfactory, they realized that they had failed to get the work request and authorization (WR&A) and other data sheets for MST-E0010 signed by Operations. When they took the data sheets for MST-E0011 to notify Operations that the MST was complete, they had the WR&A and data sheets for MST-E0010 signed. This was early on the morning of September 26, 1990.

The electricians came back to the shop and transposed data from MST-E0011 to MST-E0010 and completed the WR&A and data sheets. It should be noted that the electricians had been instructed that the date and time on an MST is started when Operations receives the prerequisite sheet and is complete when Operations is notified the testing is complete. Therefore, the data sheets for MST-E0010 were dated September 26, 1990 when data was actually taken on September 25, 1990 approximately 6 hours earlier.



Although procedure PLP-103, Surveillance and Periodic Test Program, addressed how to take credit for completing a task via another surveillance test, no procedure addressed what to do about completing the data sheets for the test not performed.

The electricians felt they were correct in completing the MST's the way they did, and had no intention of falsifying any documentation.

Corrective Actions Taken and Results Achieved:

The completed data sheets for the MST that was not performed will be removed from permanent records storage.

Corrective Actions Taken to Prevent Further Violations:

Procedure MMM-007, Maintenance Surveillance and Periodic Test Program, has been revised to clarify crafts responsibilities when taking credit for another task. Instead of transposing the data from the performed test to the data sheets of the test not performed, the performed test will be referenced on the WR&A and task sheet of the test not performed. Real Time Training will be given to appropriate maintenance personnel to ensure this change is clearly understood.

Date When Full Compliance Will Be Achieved:

Full compliance is pending completion of Real Time Training and retrieval of the data sheets from permanent record storage. These actions will be completed by January 15, 1991.



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**Carolina Power & Light Company**

P. O. Box 165 • New Hill, N. C. 27562

R. B. RICHEY  
Vice President  
Harris Nuclear Project

NOV 30 1990

Letter Number: HO-900198 (O)

Document Control Desk  
United States Nuclear Regulatory Commission  
Washington, DC 20555

NRC-735

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1  
DOCKET NO. 50-400  
LICENSE NO. NPF-63  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In reference to your letter of November 2, 1990, referring to I. E. Report RII: 50-400/90-20, 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  
Vice President  
Harris Nuclear Project

MGW:msb

Enclosure

cc: Mr. R. A. Becker (NRR)  
Mr. S. D. Ebnetter (NRC - RII)  
Mr. J. E. Tedrow (NRC - SHNPP)

MEY/HO-9001980/1/OS1

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ATTACHMENT TO CP&L LETTER OF RESPONSE  
TO NRC I. E. REPORT RII: 50-400/90-20

Reported Violation:

Technical Specification 6.8.1.a requires that written procedures be established and implemented covering procedures outlined in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 9, requires procedures for the conduct of maintenance activities.

Maintenance Management Manual MMM-012, Maintenance Work Control Procedure, section 5.3.3, requires that the operations shift foreman, or his designee, will authorize the start of work prior to craft technicians commencing work.

Plant General Order (PGO)-53, Control of Installation and Removal of Test Equipment, Jumpers and Lifted Leads, Rules of Practice, step No. 3, allows the technician to use solely a work request only if all of the listed conditions (A-E) are met. Condition "E" requires the installation/removal/restoration for lifted leads to be documented on the work request.

Contrary to the above,

1. On September 27, 1990, work was being performed which installed pipe supports for the component cooling water system without the prior knowledge and approval of the operations shift foreman or his designee.
2. On October 5, 1990, while replacing the ferro-resonant transformer and troubleshooting the uninterruptible power supply I inverter, the removal and restoration for lifted leads was not documented on the work requests.

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

Denial or Admission:

Both examples of the violation are admitted. Examples 1 and 2 of the violation are being addressed separately.

Reason for the Violation (Example 1):

On September 17, 1990, upon receiving a work package to fabricate and install pipe supports for a modification to the Component Cooling Water (CCW) System, craft personnel went to the Control Room to obtain the Shift Foreman's signature on the work request. The Shift Foreman did not sign the work request because a clearance had not been requested on the CCW System. At this point, a clearance was not needed because the job required some



Reason for the Violation (Example 1): (continued)

prefabrication before actual installation would take place. The craft began prefabrication of the piping and hangers in the plant's fabrication shop. On September 27, 1990, the craft were finished with the prefabrication portion of the job and staged the materials to the plant area and proceeded to prepare the area for the installation. During this time period the craft crew working on this modification changed. The craftsmen assumed the work requests had been signed and overlooked the fact that the Shift Foreman's authorization had not been obtained prior to beginning to prepare the area for the installation. It was at this point that the NRC inspector questioned the craftsmen about the work package.

Corrective Actions Taken and Results Achieved:

Upon discovery that the work requests had not been authorized, work was stopped and the appropriate signatures were obtained before proceeding. It should be noted that the actual modification (Corrosion Coupon Rack Installation) "Tie-In" was scheduled and discussed on a frequent basis with Operations, Technical Support, Chemistry, and Maintenance personnel. The required signature approvals would have been obtained prior to impacting permanent plant equipment and plant operations when the clearance was requested.

Corrective Actions Taken to Prevent Further Violations:

A reprimand was given to the responsible craft and foreman for their negligence. A meeting was held with appropriate craft foreman to discuss how to prevent a similar situation from occurring. A review of the MMM-012 and MAP-04 (Process Control) requirements were also discussed. This action was completed on September 28, 1990.

Date Full Compliance was Achieved:

Full compliance was achieved on September 28, 1990.

Reason for Violation (Example 2):

On October 5, 1990 the Ferro-Resonant transformer in the Uninterruptible Power Supply (UPS) SI inverter was replaced. (This had been accomplished previously on the SIII inverter without incident) This was done under Work Request and Authorization (WR&A) 90-AMNT1. All requirements noted in the repair instructions were adhered to. Independent verification of terminations was performed by Q.C. personnel and the Maintenance Foreman.



Reason for Violation (Example 2): (continued)

After transformer replacement was completed the clearance was cancelled. Two attempts were made to energize the inverter and both resulted in a delayed trip of the A.C. input circuit breaker. At this point the job was halted. The Shift Foreman was notified and WR&A 90-AMNT3. was generated to troubleshoot the problem with the inverter.

Repair instructions on WR&A 90-AMNT3 detailed troubleshooting and tuning of the new transformer in accordance with Technical Manual "PWU". This was accomplished under the direction of Technical Support Engineers. Maintenance holdpoints and independent verification of lifted leads (determination & retermination) were accomplished and documented on the WR&A. Voltage readings were taken at several points in the inverter and given to the Technical Support Engineers. It was determined that the output of the inverter was satisfactory. The inverter was turned over to Operations and subsequently declared operable.

PGO-053 Rev. 0 does not clearly identify the need to list individually the leads (lifted/landed) or jumpers installed on the WR&A. Step 3 of PGO-053 states that the landing of leads, etc., is to be documented. This was interpreted by the craft to mean that it was sufficient to add a WR&A holdpoint signoff that the leads were "determined/reterminated".

Corrective Actions Taken and Results Achieved:

An Independent Verification Log Sheet has been developed and is now being attached to corrective maintenance WR&As. This log sheet requires that leads requiring independent verification be individually listed (i.e. documented).

Corrective Actions Taken to Prevent Further Violations:

Procedure PLP-702, Independent Verification, will be revised to incorporate the new Independent Verification Log Sheet. PGO-053 will be revised to clarify the need to document individually all leads terminated/reterminatd and will reference the use of the log sheet being added to PLP-702. Training will be given to appropriate craft personnel concerning this matter.

Date When Full Compliance Will be Complete:

Full compliance is pending completion of the procedure changes stated above and training. These actions will be completed by January 15, 1991.

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