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NOTE TO ALL "RIDS" RECIPIENTS:

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APR 2 5 1991

R. B. RICHEY Vice President Harris Nuclear Project

Letter Number: HO-910051 (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 91-007-00

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

Vice President

Harris Nuclear Project

RBR:msb

Enclosure

cc: Mr. R. A. Becker (NRR)

Mr. S. D. Ebneter (NRC - RII)

Mr. J. E. Tedrow (NRC - SHNPP)

MEM/LER-91-007/1/OS1

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APPROVED OMB NO. 3150-0104

EXPIRES: 4/30/92

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH 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.

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

On 3/25/91, at approximately 1900 hours, with the plant in Mode 5 during a refueling outage, one Emergency Service Water (ESW) pump was inappropriately removed from service for outage work. The event was discovered at 0055 hours on 3/26/91, and operability was restored by 0245 hours.

Technical Specifications require two operable Residual Heat Removal (RHR) loops when in Mode 5 with reactor coolant loops not filled. Site Technical Specification Interpretations specify that Component Cooling Water (CCW) and ESW pumps and flowpaths are required to support RHR.

This event was attributed to personnel/management error and will be reviewed with operations management personnel. Technical Specifications for ESW and CCW will be annotated to indicate applicability of Technical Specification Interpretation 90-001.

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U.S. NUCLEAR REGULATORY COMMISSION

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APPROVED OMB NO. 3150-0104

EXPIRES: 4/30/92 ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH 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 PAPPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER) **TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)	PAGE (3)			
Shearon Harris Nuclear Power Plant,		YEAR SEQUENTIAL REVISION NUMBER				
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

EVENT DESCRIPTION: -

Technical Specification (TS) Section 3.4.1.4.2 requires two operable Residual Heat Removal (RHR) loops with at least one RHR loop in operation when in Mode 5 (with reactor coolant loops not filled). Site TS Interpretation 90-001 requires RHR to be capable of being manually aligned to the Reactor Coolant System (RCS) and started from Main Control Board including Component Cooling Water (CCW) and Emergency Service Water (ESW) pumps and flowpaths, to satisfy TS Section 3.4.1.4.2 operability for RHR.

Plant procedure PGO-054 was written to control activities which are performed when the RCS water level is more than 3 feet below the vessel flange, with fuel PGO-054 requires any activities to be performed during reduced in the vessel. inventory conditions be reviewed and approved by the Plant Nuclear Safety Committee (PNSC). Outage planning personnel compiled a list of planned work to be performed during reduced inventory, which included 'A' ESW work, and presented the list for PNSC review and approval on 3/19/91 and 3/20/91. Work activities identified as having potential for adversely affecting systems required for operability were postponed and the amended list was subsequently approved by the Operations Night Orders issued on 3/22/91 identified a list of work items which were not to be allowed during reduced inventory. The work associated with the 'A' ESW pump was not on this list.

On 3/25/91 the plant was in Mode 5 during a refueling outage with reactor coolant An equipment clearance had been prepared which would render loops not filled. The 'A' Emergency Diesel Generator (EDG) was the 'A' ESW pump inoperable. already inoperable for outage work. Operations personnel concluded that based on 1) the absence of the ESW pump work item from the Operations Night Orders' list, 2) management direction that the TS requirements would be satisfied, and 3) the availability of Normal Service Water (NSW) pumps (which were powered from off-site), maintenance on the 'A' ESW pump was permissible. At approximately 1900 hours, the clearance was implemented. Operations personnel questioned the advisability of this action when the clearance was hung. It was reviewed with the Senior Reactor Operator coordinating outage clearance activity, the Shift Foreman, Manager - Shift Operations and Operations Manager. In this review, the The decision was made to TS interpretation was not specifically mentioned. The computerized Limiting Condition for Operation (LCO) tracking system had flagged the 'A' ESW clearance as an incorrect action, but the basis for the The oncoming Operations outage management disagreement was not pursued. interpretation or other representative was certain that a TS specifically addressed and condoned the removal of the 'A' ESW pump under the His subsequent review lead to discovery of the guidance current circumstances. He reviewed this with the Manager - Shift in TS Interpretation 90-001. Operations and the Operations Manager. At that point a decision was made to pull out of the ESW clearance. On 3/26/91, at 0055 hours, immediate actions were initiated to restore the ESW pump by removal of the clearance. At 0245 hours the 'A' ESW pump was returned to service.

APPROVED OMB NO. 3150-0104 EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH 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.

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

EVENT DESCRIPTION: (continued)

There have been no previous similar events.

CAUSE:

The cause of this event is personnel/management error. Operations management personnel based their decision on the ability of NSW pumps to provide cooling water if needed. Operations management personnel did not adequately ensure Technical Specification requirements were met prior to taking the ESW pump out of service.

SAFETY SIGNIFICANCE:

There were no significant safety consequences as a result of this event. The cooling tower basin supplied sufficient cooling medium for 'A' train equipment during this event. If a loss of offsite power occurred, 'B' train equipment was fully capable of removing decay heat from the core.

CORRECTIVE ACTIONS:

- 1. Information regarding this event will be disseminated to operations management, outage planning and PNSC personnel.
- 2. Plant Technical Specifications for ESW and CCW will be annotated to indicate applicability of Technical Specification Interpretation 90-001.

EIIS CODE INFORMATION:

N/A