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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

APR 2 6 1991

Letter Number: H0-910045 (0)

NRC-752

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

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

Gentlemen:

In reference to your letter of March 27, 1991, referring to I.E. Report RII: 50-400/91-03, the attached is Carolina Power and Light Company's reply to the violation identified in Enclosure 1 and the deviation identified in Enclosure 2.

It is considered that the attached response is satisfactory for resolution of the items.

Thank you for your consideration in this matter.

Very truly yours,

R. B. Richey / Vice President Harris Nuclear Project

MGW:kjc

9104300232

PDR

Enclosures

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

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Enclosure 1 to CP&L Letter of Response to NRC I.E. Report RII: 50-400/91-03

Reported Violation:

Technical Specification 6.8.4.e requires that a post-accident sampling program be implemented to ensure the capability to obtain and analyze reactor coolant, plant gaseous effluents, and containment atmosphere samples. The program shall include procedures for sampling and analysis.

Regulatory Guide 1.33, Appendix A, Paragraph 10, requires that chemical and radiochemical control procedures should be written to prescribe the nature and frequency of chemical and radiochemical sampling and analyses.

Contrary to the above, on February 28, 1991, it was determined that the licensee did not have a written procedure detailing the necessary steps for the removal of a post-accident, undiluted, reactor coolant sample from the shielded container in which it is collected.

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

Denial or Admission of the Violation:

The violation as stated above is denied. It is CP&L's position that a specific procedure for this task was not required for the following reasons:

Plant Procedure CRC-821, "Post-accident RCS/RHR Sampling", specifies when and how the reactor coolant sample is to be obtained and analyzed. Plant Procedure CRC-502, "Operation of the Dionex Q.I.C. Ion Chromatograph for Anion Analysis" specifies how to perform chloride analysis on-site.

Per CRC-821, a diluted reactor coolant sample is to be analyzed on-site and an undiluted reactor coolant sample is to be obtained in the portable shielded container "pig." The undiluted liquid sample is used to meet the NUREG-0737, II.B.3 requirement for chloride analysis of an undiluted reactor coolant sample within 30 days.

The undiluted sample can be analyzed on-site or sent off-site for analysis. The off-site analysis option can be exercised by the Radiological Control Director and the Chemistry Coordinator for any reason, e.g., high dose rates from the undiluted sample. Recognizing the need for this option, CP&L maintains a contract with a vendor to perform analysis of highly radioactive samples off-site.



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Denial or Admission of the Violation: (continued)

The "mechanics" of removing the sample from the "pig" is simplistic and straight forward. Depending on the dose rates which can be determined from the diluted sample and portable survey instruments, effective radiation protection precautions would be prescribed. This is consistent with many plant activities involving potential highly radioactive materials.

CRC-821 states in several sections the need for using ALARA principles, Radiation Work Permits, and Radiation Control (RC) technician coverage during PASS sampling, sample transport and analysis. Many other plant procedures, both normal operation procedures and emergency procedures, address handling and storing radioactive materials including samples. Because of these procedures and the RC related wording in PASS procedures, no specific written procedure was written for this task.

It is CP&L's position that a specific procedure was not needed. However, as stated in the Exit Interview for this inspection, CP&L agreed to prepare specific written instructions to enhance our program. We also stated at the Exit Interview that we considered this a program enhancement and not a requirement.

A revision to CRC-821 will provide instructions for retrieval of the undiluted liquid sample from the shielded container. This revision will address the need for evaluating the radiological hazards and the identification of protective measures. The specific requirements will depend on the activity level of the sample in question which can be estimated from the analysis of the diluted sample. This revision will be completed by June 15, 1991.

MEM/HO-9100450/3/0S1

Enclosure 2 to CP&L Letter for Response to NRC I.E. Report RII: 50-400/91-03

Reported Deviation:

The licensee committed, in correspondence to the Office of Nuclear. Reactor Regulation, dated May 19, 1988, to semiannual retraining of the chemistry technicians qualified to operate the Post Accident Sampling System.

Contrary to the above, it was determined on February 28, 1991, that chemistry technicians qualified to operate the Post Accident Sampling System were not being retrained semiannually.

Reason for the Deviation

Participation by chemistry technicians in the quarterly Post Accident Sampling System (PASS) operability testing was intended to be used to meet the semi-annual retraining commitment. Credit for training was given for either PASS Sampling or Laboratory Analysis of PASS Samples. The expectation was that with normal rotation, a sufficient number of technicians would have completed hands-on training at least twice a year. Some technicians did complete the twice a year training commitment. However, more attention was placed on the scheduling and completion of the quarterly operability test than on which technicians were conducting the tests, resulting in fewer than expected technicians receiving the semi-annual retraining.

Corrective Steps Planned to Prevent Further Deviations:

The PASS semi-annual training requirements and the documentation of training completion will be clarified and incorporated into plant procedure, CRC-830, "Periodic Maintenance and Operability Verification of the PASS." A group of approximately ten chemistry technicians will be designated as "PASS operators" and will participate in the semi-annual hands-on PASS training.

Date When Corrective Actions will be Completed:

The revision to CRC-830 will be completed by June 30, 1991, with implementation of the revised training program beginning by July 1, 1991.



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