

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
 AUTH. NAME AUTHOR AFFILIATION
 RICHEY, R.B. Consumers Power Co.
 RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 910627 ltr re violations noted in Insp Rept 50-400/91-13. Corrective actions: instructions provided to operators to use main feedwater to feed steam generators whenever practical.

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NOTES: Application for permit renewal filed. 05000400

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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

JUL 25 1991

Letter Number: HO-910105 (0)

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United States Nuclear Regulatory Commission
Washington, DC 20555

NRC-759

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 June 27, 1991, referring to I.E. Report RII: 50-400/91-13, the attached is Carolina Power and Light Company's reply to the violation identified in Enclosure 1.

It is considered that the corrective actions taken 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:mbr

Attachment

cc: Ms. B. L. Mozafari (NRC)
Mr. S. D. Ebnetter (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: 50-400/91-13
Violation

Reported Violation:

Technical Specification (TS) Limiting Condition for Operation 3.7.1.2 requires three auxiliary feedwater pumps and associated flow paths to be operable. Action b of this specification requires the plant to proceed from Hot Standby to Hot Shutdown within six hours if two auxiliary feedwater pump flow paths are inoperable.

Contrary to the above, from approximately 11:18 a.m. - 5:22 p.m. on May 19, 1991, and 12:14 a.m. - 6:47 a.m. on May 20, 1991, the plant was operated in the Hot Standby mode with two inoperable auxiliary feedwater pump flow paths.

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

Denial or Admission and Reason for the Violation:

The violation is denied.

On May 20, 1991, the plant was in MODE 3 preparing for plant startup. Steam generator levels were being maintained by feeding with one of the motor-driven auxiliary feedwater pumps. To perform this feeding without causing a plant cooldown, flow was provided to only one steam generator at a time. The use of the Auxiliary Feedwater System to feed the steam generators during plant startup is described in the plant FSAR and had been previously reviewed by the NRC during plant licensing. A concern was identified by the NRC Resident Inspector with whether the way auxiliary feedwater was being used resulted in two auxiliary feedwater pumps being inoperable. The Auxiliary Feedwater System is required operable in MODES 1 - 3 by Technical Specification 3.7.1.2.

The Auxiliary Feedwater System is designed to have all motor-operated and electro-hydraulic valves full open when it is aligned for emergency standby operation. The steam generators are isolated from the auxiliary feedwater pumps by check valves that open to allow forward flow when the Auxiliary Feedwater System is actuated. During plant start-up the requirement to have full Auxiliary Feedwater flow available is not necessary as the decay heat present to be removed is minimal. If Auxiliary Feedwater did actuate during plant startup, one of the operators immediate actions in accordance with the plant Emergency Operating Procedures would be to throttle or secure flow to prevent overfilling the steam generators.

Technical Specification Surveillance Requirement 4.7.1.2.1.a.3 specifies that each valve in the flow path shall be in its correct position. Feeding the steam generators during plant startup requires flow to be isolated to two steam generators and flow to be throttled to the third steam generator during the filling process. This is done under operator control as necessary to maintain steam generator level. The use of the Auxiliary Feedwater System for plant startup was the original design of the system. The NRC reviewed and concurred with this design as discussed in Section 10.4.9 of the Shearon Harris Safety Evaluation Report (SER). In addition, Supplement 4 of the Shearon Harris SER specifically credits use of the Auxiliary Feedwater System

Denial or Admission and Reason for the Violation: (continued)

during plant startup as a basis for accepting the draft Auxiliary Feedwater System Technical Specification.

It has been determined the Auxiliary Feedwater System was being used as originally designed, reviewed and accepted. The use of the Auxiliary Feedwater System for startup has minimal safety significance, as flow would be throttled or secured immediately by the operators during this mode to prevent steam generator overfill if the system actuated. It is agreed that Technical Specification 3.7.1.2 does not clearly allow this mode of operation, therefore a Technical Specification change will be submitted to clarify that in MODES 2 and 3 flow can be throttled under operator control as required to maintain steam generator levels.

Interim corrective actions were implemented as a result of this identified problem. Instructions were provided to the operators to use main feedwater to feed the steam generators during MODES 1 - 3 whenever practical. Auxiliary feedwater pumps may still be used in an off-normal situation provided they are declared inoperable whenever associated valves are not fully open. If the Auxiliary Feedwater System is used to feed the steam generators, the auxiliary feedwater pumps are returned to operable when the system is realigned to its emergency standby lineup with all valves fully opened. This places the plant into a six hour Limiting Condition of Operation each time the Auxiliary Feedwater System is used to feed the steam generators during plant startup. These instructions on system operability were included into the following plant procedures on the dates indicated:

| | | |
|--------|--|---------------|
| GP-002 | Normal Plant Heatup from Cold Solid to Hot Subcritical | July 12, 1991 |
| GP-004 | Reactor Startup (Mode 3 to Mode 2) | June 07, 1991 |
| GP-006 | Normal Plant Shutdown from Power Operation to Hot Standby (Mode 1 to Mode 3) | June 07, 1991 |
| GP-007 | Normal Plant Cooldown (Mode 3 to Mode 5) | July 12, 1991 |
| OP-137 | Auxiliary Feedwater System | June 07, 1991 |

A Technical Specification Change Request will be submitted to clarify the use of the Auxiliary Feedwater System for feeding the steam generators during MODES 2 and 3. Upon approval of this request, the procedures listed above will be revised as appropriate. This Technical Specification Change Request will be submitted by December 1, 1991.