

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9201030173 DOC. DATE: 91/12/26 NOTARIZED: NO DOCKET #
 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
 AUTH. NAME AUTHOR AFFILIATION
 RICHEY, R. B. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Provides response to 911127 ltr re violations noted Insp Rept 50-400/91-24. Corrective action: deficiencies associated w/circuits corrected, including verification of proper calibr.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: S
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES: Application for permit renewal filed. 05000400 A

	RECIPIENT		COPIES		RECIPIENT		COPIES	
	ID CODE	NAME	LTR	ENCL	ID CODE	NAME	LTR	ENCL
	PD2-1	PD	1	1	MOZAFARI, B.		1	1
INTERNAL:	ACRS		2	2	AEOD		1	1
	AEOD/DEIIB		1	1	AEOD/DSP/TPAB		1	1
	DEDRO		1	1	NRR HARBUCK, C.		1	1
	NRR MORISSEAU, D		1	1	NRR/DLPQ/LHFBPT		1	1
	NRR/DLPQ/LREB10		1	1	NRR/DOEA/OEAB		1	1
	NRR/DREP/PEPB9H		1	1	NRR/DST/DIR 8E2		1	1
	NRR/PMAS/ILRB12		1	1	NUDOCS-ABSTRACT		1	1
	OE DIR		1	1	OGC/HDS1		1	1
	REG FILE 02		1	1	RGN2 FILE 01		1	1
EXTERNAL:	EG&G/BRYCE, J. H.		1	1	NRC PDR		1	1
	NSIC		1	1				

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 24 ENCL 24



Carolina Power & Light Company

HARRIS NUCLEAR PROJECT

P.O. Box 165

New Hill, North Carolina 27562

DEC 26 1991

Letter Number: HO-910249 (0)

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

NRC-770

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 November 27, 1991, referring to NRC Inspection Report RII: 50-400/91-24, the attached is Carolina Power and Light Company's reply to the violations identified in Enclosure 1.

It is considered that the corrective actions taken/planned are satisfactory for resolution of the violations.

Thank you for your consideration in this matter.

Very truly yours,

CS Hinman FOR

R. B. Richey
Vice President
Harris Nuclear Project

MGW:dmw

Attachment

cc: Mr. S. D. Ebnetter (NRC-RII)
Ms. B. L. Mozafari (NRC)
Mr. J. E. Tedrow (NRC - SHNPP)

300085

MEM/HO-910249.0/1/OS1
9201030173 911226
PDR ADOCK 03000400
Q FBR

FE01

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO: 50-400/91-24

VIOLATION (400/91-24-02)

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 8.b requires procedures for the conduct of surveillance tests.

Contrary to the above, surveillance procedure OST-1021, Daily Surveillance Requirements, which implemented the requirements of TS 4.1.2.1.a and 4.1.2.2.a, was not adequate in that it did not properly verify that the emergency boration flowpath was maintained greater than 65 degrees F.

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

Denial or Admission and Reason for the Violation:

The violation is admitted.

Investigation has disclosed that comments made during the review of Revision 2 to OST-1021 in May of 1986 (prior to plant start-up) raised the question of how much of the boric acid flowpath should be monitored. At this time, it was determined that monitoring the temperature of the boric acid tank and the piping at the blending tee (the two ends of the flowpath) was sufficient. The departure of some of the personnel involved and the nearly six years of elapsed time make it effectively impossible to reconstruct details of the thought processes at that time.

Corrective Steps Taken and Results Achieved:

The Boric Acid Tank (BAT) and its associated lines were declared inoperable on November 14, 1991. After identifying the need to use heat tracing as the preferred method of meeting Technical Specification Surveillances 4.1.2.1.a and 4.1.2.2.a, temperature maintenance circuits (heat tracing and room heaters) along the boration flow path between the boric acid tank and the charging pump suction header were identified. Deficiencies associated with these circuits were corrected, including verification of proper calibration. The BAT and associated lines were declared operable on December 7, 1991. Throughout the period when the BAT was inoperable, other boration flowpaths were available to provide compliance with Technical Specification 3.1.2.2.

Corrective Steps Taken To Prevent Further Violations:

OST-1021 was revised on December 2, 1991, to record temperature maintenance data as a means of verifying a minimum temperature of 65°F along the boration flowpath from the BAT to the charging pump suctions.

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/91-24
(continued)

Date When Full Compliance Was Achieved:

Full compliance was achieved on December 7, 1991.

VIOLATION (400/91-24-03)

Reported Violation:

TS 4.0.5 requires that inservice testing of pumps shall be in accordance with Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code.

ASME Section XI, Subsection IGP, Inservice testing of Pumps in Nuclear Power Plants, Section IGP 3230.(a), requires that the testing frequency shall be doubled until the cause of the deviation is determined or corrected.

Contrary to the above, the boric acid pump shutdown quarterly testing frequency was not doubled as required for previously identified pump degradation. Therefore, subsequent to successful testing on March 16, 1991, the boric acid pumps were not tested six weeks later during a plant shutdown to cold shutdown in May 1991.

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

CP&L Comment

The second paragraph of the reported violation is in error in that it references ASME Section XI, subsection IGP which applies to gas cooled nuclear power plants. The paragraph should read as follows:

ASME Section XI, Subsection IWP, Inservice testing of Pumps in Nuclear Power Plants, Section IWP 3230.(a), requires that if pump performance falls within the Alert Range, then the testing frequency shall be doubled until the cause of the deviation is determined or corrected.

Denial or Admission and Reason for the Violation:

The violation is admitted.

The violation occurred due to an interpretation of the wording in the IST program plan (ISI-203) and the program plan SER. ISI-203 states that the test which measures flow (referred to in the violation as the shutdown test) will be performed while borating to cold shutdown. This inferred a one time test from one full cold shutdown to the next with no mention of frequency other than the cold shutdown event itself. Also, the SER makes mention that the shutdown test is a method of establishing the validity of the quarterly test (OST's 1007 & 1106) in terms of maintaining a fixed test circuit flow resistance. Given these inferences, ISI personnel concluded that the quarterly test alone met the requirements of IWP-3230(a), once its validity had been established. It should

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/91-24
(continued)

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

also be noted that nowhere is it stated that the shutdown test shall have a quarterly test frequency. Additionally, ASME Section XI does not associate cold shutdown frequency testing with pumps. Hence, the exact meaning of the term cold shutdown frequency testing in the SER is unclear.

Corrective Steps Taken and Results Achieved:

The Surveillance Test Scheduling System (STSS) has been updated to place OST-1505, Boric Acid Flow Path Check Valve ISI Valve Test Quarterly Interval Mode 5, on a semi-quarterly test frequency.

Corrective Steps Taken To Prevent Further Violations:

The wording in ISI-203 will be clarified to be consistent with the NRC's interpretation as established in the subject Notice of Violation.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by March 6, 1992 upon the clarification to ISI-203 as stated above.

VIOLATION (400/91-24-04)

Reported Violation:

10 CFR 50, Appendix B, Criterion XVI, states that measures shall be established to assure conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.

The licensee's Corporate Quality Assurance Manual, paragraph 12.3.1, further requires that personnel are responsible for reporting conditions adverse to quality, discovered as a result of inspections, observations, surveillance, assessments, monitoring, audits, tests, checks, and review of documents.

Alarm response procedure APP-111, Freeze Protection and Temperature Maintenance, Sections ALB 111-8-4, HT-18753 B RAB Trouble, and ALB 111-8-5, HT-18753 C RAB Trouble, action 2.f, requires the operator to initiate a work request to correct an indicated problem.

Contrary to the above, measures were not taken to assure that conditions adverse to quality were promptly identified and corrected in that multiple alarms were received on heat trace alarm panels HT-18753 B and HT-18753 C and operations failed to initiate work requests as required by action 2.f of the alarm response procedure.

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

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/91-24
(continued)

Denial or Admission and Reason for the Violation:

The violation is admitted.

The violation occurred due to a failure to recognize that portions of the Temperature Maintenance System were required to support safety functions and support Technical Specification surveillance requirements and therefore, sufficient emphasis was not placed on timely correction of temperature maintenance problems.

Corrective Steps Taken and Results Achieved:

The BAT and its associated lines were declared inoperable on November 14, 1991, and work was initiated to make the associated temperature maintenance circuits operable. The required circuits were functioning and the BAT was declared OPERABLE on December 7, 1991. Throughout the period when the BAT was inoperable, other boration flowpaths were available to provide compliance with Technical Specification 3.1.2.2.

An evaluation of the temperature maintenance circuits for the Hydrogen Monitoring System and the Radiation Monitoring System has determined that heat tracing is not required to support the operability requirements of these systems.

Corrective Steps Taken to Prevent Further Violations:

Additional training on the operation and significance of the temperature monitoring panels has been developed and provided to the operations staff. This training discussed the cause of the various alarms on the panels and emphasized the need to acknowledge alarms and initiate appropriate corrective action (Real Time Training RTT 91-054). The training was completed for active operations and radwaste personnel on December 11, 1991. These actions will sensitize the operators to the significance of the temperature monitoring circuits, and ensure that appropriate efforts are undertaken to restore them to service when problems are encountered.

The Technical Support staff responsible for the Temperature Maintenance System has been sensitized to the significance of the systems operability.

A design change has been initiated to facilitate easier identification and correction of Temperature Maintenance System problems. This design change involves the addition of alarm relay reset switches and hi/lo alarm annunciators in the Temperature Maintenance Data Logger. This will provide a means of identifying the time and type of alarms as they occur as well as alarm reset capability.

Date When Full Compliance Was Achieved:

Full compliance was achieved on December 11, 1991.

