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 VAUGHN, G. E. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC 920730 ltr re violations noted in Insp Rept 50-400/92-13. Corrective actions: QC inspector reverification tracking sys enhanced & motor-driven auxiliary feedwater pumps tested & inspected.

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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, NC 27562

G. E. VAUGHN
Vice President
Harris Nuclear Project

AUG 28 1992

Letter Number: HO-920123

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

NRG-788

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 July 30, 1992, referring to NRC Inspection Report RII: 50-400/92-13, 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,



G. E. Vaughn
Vice President
Harris Nuclear Project

MGW:dmw

Attachment

cc: Mr. S. D. Ebnetter (NRC-RII)
Mr. N. B. Le (NRC-NRR)
Mr. J. E. Tedrow (NRC-SHNPP)

MEM/HO-920123/1/OS1

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REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/92-13

VIOLATION (400/92-13-01)

Reported Violation:

10CFR Part 50, Appendix B, Criterion II, requires that personnel performing activities affecting quality be indoctrinated and trained as necessary to assure that suitable proficiency is achieved and maintained.

The licensee's Corporate Quality Assurance Manual, Section 7.5, requires that inspection and nondestructive examination personnel be qualified and certified in accordance with Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel. Regulatory Guide 1.58 endorses the requirements of ANSI N45.2.6-1978, Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants.

ANSI N45.2.6-1978, paragraph 2.3, requires that job performance of inspection, examination, and testing personnel shall be reevaluated at periodic intervals not to exceed three years.

Quality Verification Procedure QVS-103, Personnel Indoctrination, Training, Qualification, and Certification, Section 7.8.1, specifies that personnel performing quality control inspection and surveillance activities shall be recertified at intervals not to exceed three years.

Contrary to the above, as of June 23, 1992, five quality control inspection personnel were not properly recertified within three years to perform nondestructive examination activities.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

On June 23, 1992, while performing a review of inspectors certifications, it was noted that recertification dates had lapsed in five instances. Since the involved inspection personnel had continued to perform inspections in their area of expertise the appropriate reevaluation forms were completed based on current and past experience. The completion of the reevaluation forms is the normal process for recertification of technicians on a three year interval.

The violation occurred due to a QC Management oversight with regard to the recertification program. The recertification program was set up by the previous QC Manager and had proven to be an effective tool up to this date. The program was set up on the QC Manager's computer and print out sheets were kept in a separate log. During turnover of the QC Manager position earlier this year, the process for keeping inspector certifications current was not communicated clearly to the new QC Manager.



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(continued)

Corrective Steps Taken and Results Achieved:

The five QC personnel involved were recertified based on current and past experience. This was completed on June 24, 1992.

Corrective Steps Taken To Avoid Further Violations:

The QC inspector recertification tracking system has been enhanced. An additional check has been added which provides a two (2) week prior notification of upcoming recertification dates. The recertification date monitoring function has been reassigned to the HNP-QC clerk.

Date When Full Compliance Was Achieved:

Full compliance was achieved on June 26, 1992.

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VIOLATION (400/92-13-02)

Reported Violation:

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

The licensee's Corporate Quality Assurance Manual, Section 15, Conditions Adverse To Quality and Corrective Action, implement this requirement. Section 15 of this manual states that personnel are responsible for reporting conditions adverse to quality.

Contrary to the above, plant personnel did not report conditions adverse to quality when the Auxiliary Feedwater (AFW) pump motors exceeded the starting duty limitations as specified by the AFW operating procedure and manufacturer's nameplate data. This action prevented an appropriate operability determination and delayed a reportability evaluation.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The violation occurred due to oversight by the operating shift. The shift did not log the four AFW actuations that occurred following the July 12, 1992, reactor trip, or realize the significance with respect to motor duty cycles. The shift was having difficulties stabilizing primary side temperature, pressure, and inventory; coincident with secondary side concerns with elevated condensate temperatures and new guidelines on AFW system operation. These factors contributed to both causing and not identifying the excessive AFW pump starts.

Corrective Steps Taken and Results Achieved:

Both motor driven AFW pumps were tested and inspected. Results showed that the motors were not adversely affected by the excessive starts.

Corrective Steps Taken to Avoid Further Violations:

1. Operating shift personnel will review this event. The review will emphasize the following:
 - a. Existing requirement to log the starting and stopping of major equipment.

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(continued)

Corrective Steps Taken to Avoid Further Violations: (continued)

- b. Existing requirement to ensure motor starting duties are not exceeded.
 - c. Steps to take if starting duties are exceeded.
 - d. Weaknesses of operator actions contributing to this event.
2. OMM-004 "Post Trip/Safeguards Review" contains checklists used to verify proper equipment operation following any automatic actuation. The appropriate checklists will be revised to check that motor starting duties were not exceeded.
3. A simulator scenario used in Licensed Operator Retraining (LOR) will be developed/revised to include an event that could result in exceeding motor starting duties.

Date When Full Compliance Will Be Achieved:

Corrective Steps 1 and 2 will be completed by September 30, 1992. Corrective Step 3 will be placed in the 1993 LOR Simulator Schedule and completed by June 1993.