



UNITED STATES  
 NUCLEAR REGULATORY COMMISSION  
 REGION II  
 101 MARIETTA STREET, N.W.  
 ATLANTA, GEORGIA 30323

Report No.: 50-400/92-18

Licensee: Carolina Power and Light Company  
 P.O. Box 1551  
 Raleigh, NC 27602

Docket No.: 50-400

License No.: NPF-63

Facility Name: Shearon Harris

Inspection Conducted: August 31 - September 4, 1992

Inspector: *L. King*  
 L. King, Reactor Inspector

9/17/92  
 Date Signed

Approved by: *R. Crlenjak*  
 R. Crlenjak, Chief  
 Operational Programs Section  
 Division of Reactor Safety

9/17/92  
 Date Signed

SUMMARY

Scope: This was a special announced Emergency Operating Procedure followup inspection. Its purpose was to verify that corrective actions for previous findings in the area of emergency and abnormal operating procedures were adequate.

Results: The overall assessment concluded that the licensee response to the Inspector Followup Items identified in inspection report 50-400/90-11 addressed all of the concerns and that the Emergency Operating Procedures were adequate to mitigate the spectrum of accidents addressed in the Emergency Response Guidelines.

## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*J. Bradley, Manager Operations Support - Operations
- \*E. Brooks, Operations Procedure Coordinator - Operations
- \*J. Collins, Manager of Operations
- \*C. Gibson, Manager of Programs and Procedures
- \*M. Hamby, Project Specialist - Regulatory Compliance
- \*S. Hinnant, Plant General Manager
- \*S. McCoy, Shift Technical Advisor
- \*V. McGrew, Shift Technical Advisor
- \*J. Moyer, Manager of Project Assessment
- \*C. Olexik, Manager - Regulatory Compliance
- \*M. Wallace, Senior Specialist - Regulatory Compliance

#### NRC Resident Inspectors

- \*J. Tedrow, Senior Resident Inspector
- M. Shannon, Resident Inspector

\*Attended exit interview on September 4, 1992.

### 2. Actions on Previous Inspection Findings (92701)

- a. (Closed) IFI 400/90-11-01: This item addressed Procedure Generation Package inadequacies.

The requirements for writing and maintaining the Emergency Operating Procedures were incorporated into a new administrative procedure, OMM-021, Maintenance of Emergency Operating Procedures. OMM-021 superseded the Procedure Generation Package and controls OMM-005, Emergency Operating Procedures Writer's Guide, and OMM-020 Emergency Operating Procedure Verification and Validation Program.

- b. (Closed) IFI 400/90-11-02: This item addressed inadequate Step Deviation Document justifications.

The inadequate Step Deviation Document justifications were revised with the new issue of the Emergency Operating Procedures. OMM-021 stated that any deviations from the Emergency Response Guidelines would be justified.

- c. (Closed) IFI 400/90-11-03: This item addressed technical and human factors discrepancies.

The licensee addressed all of the comments in Appendix B. The inspector reviewed all of the responses and found them acceptable.

- d. (Closed) IFI 400/90-11-04: This item addressed Writer's Guide discrepancies.

The new issue of the Writer's Guide, Revision 7, incorporated most of the comments in Appendix C of inspection report 400/90-11 and where the comments were not incorporated, the inspector found the responses acceptable.

- e. (Closed) IFI 400/90-11-05: This item addressed Emergency Operating Procedure nomenclature inaccuracies.

The nomenclature inaccuracies were incorporated in most cases and where they were not, the inspector found the justification for not changing them to be adequate.

- f. (Closed) IFI 400/90-11-06: This item addressed inadequate Verification and Validation of locally performed actions.

New procedure OMM-020, Emergency Operating Procedure Verification and Validation Program, step 5.2.2.1 stated that local actions were to be validated to the same extent as any other Emergency Operating Procedure action. However, this was a new procedure and had not been fully implemented. The procedure did not require validation except for major revisions or every two years. This item was closed based on the licensee identifying all local actions that have to be validated and committing to do them during the next validation.

### 3. Exit Interview

The inspection scope and findings were summarized on September 4, 1992, with those persons indicated in paragraph 1. The NRC described the areas inspected and discussed in detail the inspection findings listed below. No proprietary material is contained in this report. No dissenting comments were received from the licensee.

<u>Item Number</u>	<u>Status</u>	<u>Description, Paragraph</u>
IFI 400/90-11-01	Closed	Procedure Generation Package inadequacy, paragraph 2
IFI 400/90-11-02	Closed	Inadequate Step Deviation Document justifications, paragraph 2
IFI 400/90-11-03	Closed	Technical and human factors discrepancies, paragraph 2
IFI 400/90-11-04	Closed	Writer's Guide discrepancies, paragraph 2
IFI 400/90-11-05	Closed	Emergency Operating Procedure nomenclature inaccuracies, paragraph 2
IFI 400/90-11-06	Closed	Inadequate Verification and Validation of locally performed actions, paragraph 2

## Appendix A

### PROCEDURES REVIEWED

EOP-PATH-1	REV 6/1	Path-1
EOP-PATH-2	REV 5/1	Path-2
EOP-EPP-001	REV 5	Loss of All AC Power to 1A-SA and 1B-SB Busses
EOP-EPP-002	REV 4	Loss of All AC Power Recovery Without SI Required
EOP-EPP-003	REV 4	Loss of All AC Power Recovery With SI Required
EOP-EPP-004	REV 4	Reactor Trip Response
EOP-EPP-005	REV 5	Natural Circulation Cooldown
EOP-EPP-006	REV 4	Natural Circulation Cooldown With Steam Void in Vessel (With RVLIS)
EOP-EPP-007	REV 4	Natural Circulation Cooldown With Steam Void in Vessel (Without RVLIS)
EOP-EPP-008	REV 4	SI Termination
EOP-EPP-009	REV 4	Post-LOCA Cooldown and Depressurization
EOP-EPP-012	REV 4	Loss of Emergency Coolant Recirculation
EOP-EPP-013	REV 4	LOCA Outside Containment
EOP-EPP-014	REV 4	Faulted Steam Generator Isolation
EOP-EPP-015	REV 4	Uncontrolled Depressurization of all Steam Generators
EOP-EPP-017	REV 4	Post-SGTR Cooldown Using Backfill
EOP-EPP-018	REV 4	Post-SGTR Cooldown Using Blowdown
EOP-EPP-020	REV 4	SGTR with Loss of Reactor Coolant: Subcooled Recovery
EOP-EPP-021	REV 4	SGTR with Loss of Reactor Coolant: Saturated Recovery
EOP-EPP-022	REV 5	SGTR without Pressurizer Pressure Control
EOP-FRP-C.1	REV 4	Response to Inadequate Core Cooling
EOP-FRP-C.2	REV 4	Response to Degraded Core Cooling
EOP-FRP-H.1	REV 5	Response to Loss of Secondary Heat Sink
EOP-FRP-H.2	REV 4	Response to Steam Generator Overpressure
EOP-FRP-H.3	REV 4	Response to Steam Generator High Level
EOP-FRP-H.4	REV 4	Response to Loss of Normal Steam Release Capability
EOP-FRP-I.2	REV 4	Response to Low Pressurizer Level
EOP-FRP-J.2	REV 4	Response to Containment Flooding
EOP-FRP-P.1	REV 4	Response to Imminent Pressurized Thermal Shock
EOP-FRP-S.1	REV 4	Response to Nuclear Power Generation/ATWS
EOP-CSFST	REV 3	Critical Safety Function Status Trees
AOP-001	REV 5	Malfunction of Rod Control and Indication Systems
AOP-002	REV 7	Emergency Boration
AOP-003	REV 4	Malfunction of Reactor Make-up Control
AOP-004	REV 6	Shutdown in Case of Fire or Control Room Inaccessibility
AOP-005	REV 6	Radiation Monitoring System
AOP-008	REV 6	Accidental Release of Liquid Waste
AOP-009	REV 7	Accidental Release of Waste Gas
AOP-010	REV 6	Feedwater Malfunctions
AOP-012	REV 5	Partial Loss of Condenser Vacuum



## Appendix A

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AOP-014	REV 6	Loss of Component Cooling Water
AOP-017	REV 5	Loss of Instrument Air
AOP-018	REV 5	Reactor Coolant Pump Abnormal Conditions
AOP-019	REV 4	Malfunction of RCS Pressure Control
AOP-020	REV 7	Loss of RCS Inventory or Residual Heat Removal While Shutdown
AOP-021	REV 5	Seismic Disturbances
AOP-022	REV 5	Loss of Service Water
AOP-024	REV 5	Loss of Uninterruptible Power Supply
AOP-025	REV 6	Loss of One Emergency AC (6.9KV) or One Emergency DC (125V) Bus
AOP-026	REV 4	Loss of Essential Services Chilled Water System
AOP-028	REV 6	Low Voltage Operation
AOP-029	REV 6	Low Frequency Operation
AOP-030	REV 4	Metal Impact Monitoring System Trouble
AOP-031	REV 4	Loss of Refueling Cavity Integrity
AOP-032	REV 4	High RCS Activity
AOP-034	REV 4	Axial Flux Difference
AOP-035	REV 3	Main Transformer Trouble
AOP-036	REV 0	Safe Shutdown Following a Major Fire
AP-301	REV 1/1	Adverse Weather Operations
EOP-USER'S GUIDE	REV 2	EOP User's Guide
OMM-006	REV 7	EOP Writer's Guide
OMM-020	REV 0	Emergency Operating Procedure Verification and Validation Program
OMM-021	REV 0	Maintenance of Emergency Operating Procedures

