

OFFICIAL RECORD COPY

JUN 10 1993

Docket No. 50-400
License No. NPF-63

Carolina Power and Light Company
ATTN: Mr. G. E. Vaughn
Vice President
Shearon Harris Nuclear Power Plant
P. O. Box 165 - Mail Zone 1
New Hill, NC 27562-0165

Gentlemen:

SUBJECT: NRC INSPECTION REPORT NO. 50-400/93-03

Thank you for your response of March 26, 1993, to our Notice of Violation issued on February 25, 1993, concerning activities conducted at your Shearon Harris facility. We have evaluated your response and found that it meets the requirements of 10 CFR 2.201.

After reviewing your letter, we agree with your conclusion that Violation A, Example 1, did not constitute a violation. We also agree that Violation B should be changed from a Severity Level V Violation to a Non-Cited Violation. Accordingly, we will adjust our records to reflect that no cited violation of regulatory requirements occurred with respect to Violation A, Example 1 and Violation B.

In your response, you denied Violation A, Example 2. You stated as the bases for your denial that an alternate means of transmitting plant operating data to the Technical Support Center (TSC) and Emergency Operations Facility (EOF) was available and, that the problem that ultimately would cause the non-operational state noted by the inspector had been recognized on January 21, 1993.

After careful consideration of the bases for your denial of Violation A, Example 2, we have concluded, for the reasons presented in the enclosure to this letter, that the violation occurred as stated in the Notice of Violation. Therefore, in accordance with 10 CFR 2.201(a), please submit to this office within 30 days of the date of this letter a written statement describing steps which have been taken to correct Violation A, Example 2, and the results achieved, corrective steps which will be taken to avoid further violations, and the date when full compliance will be achieved.

We will examine the implementation of your actions to correct the violations during future inspections.

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The responses directed by this letter and its enclosure are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No 96-511.

We appreciate you cooperation in this matter.

Sincerely,

15/

J. Philip Stohr, Director
Division of Radiation Safety
and Safeguards

Enclosure:
Evaluations and Conclusions

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ENCLOSURE

EVALUATION AND CONCLUSION

On February 25, 1993, a Notice of Violation (Notice) was issued for violations identified during a routine NRC inspection. Shearon Harris responded to the Notice on March 26, 1993. In the licensee's response to the Notice, the Violation was denied because there were alternate means of transmitting plant data and because the ultimate source of the problem which made the Emergency Response Facility Information System (ERFIS) terminal fail to operate had been recognized several days before the ERFIS terminals were found by the NRC to be inoperable.

Restatement of Violation A, Example 2

10 CFR 50.54(q) states that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect an emergency plan which meets the standards in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. 10 CFR 50.47(b)(8) requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.

Section 3.1 of the Shearon Harris Emergency Plan, which implements 10 CFR 50.47(b)(8), states that adequate emergency facilities, communication, and equipment to support emergency response are provided and maintained.

Section 3.5.3.b of the Shearon Harris Emergency Plan identifies ERFIS consoles, capable of displaying plant data, Safety Parameter Display System (SPDS), and Radiation Monitoring System (RMS), as Emergency Operations Facility (EOF) equipment to be maintained.

Contrary to the above, when an operational demonstration was requested by the inspector, EOF ERFIS terminals 1, 2, and 3 did not operate.

Summary of Licensee's Response:

The licensee stated "It is true that when an operational demonstration was requested by the inspector on January 26, 1993, the EOF ERFIS terminals 1, 2, and 3 did not operate." The licensee also argued that alternate means of transmitting plant operating data to the Technical Support Center (TSC) and EOF was available. In addition, the licensee stated that the problem that ultimately would cause the non-operational state noted by the inspector had been recognized on January 21, 1993, and that a work ticket was initiated at that time. The licensee stated the EOF equipment had been operating properly just prior to the NRC inspection but that a component failed to operate properly when actuated as part of the upgrade to the ERFIS. The licensee stated the EOF equipment was placed back on line within 30 minutes the day after the equipment was identified by the NRC as being out of service. The licensee contends the issue is not a violation in that the problem had been self-identified and the ability to place the equipment back on line was available and demonstrated.

NRC Evaluation

The licensee agreed that the ERFIS terminals failed to operate when requested by NRC. The NRC inspector was aware that an alternate means of transmitting plant operating data to the EOF was available and concluded that such measures should be taken to compensate for the loss of the ERFIS terminals. However, the violation was concerned with the maintenance of the ERFIS terminals. Compensatory measures are not a substitute for adequate maintenance of required equipment.

The ERFIS system has a history of problems. During a previous inspection in June 1991, a similar problem occurred with the ERFIS. Specifically, all of the EOF ERFIS terminals failed to function on command and required technical assistance to activate. At that time, a work request had been issued to attempt to identify the problems. That failure of the terminal to operate was subsequently classified by NRC as a non-cited violation based on licensee planned corrective action to upgrade the system. During this inspection, the ERFIS terminals again failed to operate when requested and the immediate attempt to trouble shoot the system was unsuccessful. To examine the maintenance history of the ERFIS system, the inspector requested a current listing of work requests on the ERFIS system. That listing indicated that a substantial number of work requests were awaiting completion. The work request list indicated that ERFIS needed increased attention to assure the system was maintained in an operable state consistent with its emergency response function. Also, on February 6, 1993, following the subject NRC inspection, the licensee met an established emergency action level and declared a Notification of Unusual Event when the ERFIS computer failed to be operable for more than four hours.

The licensee stated that they maintain technical personnel capable of working on the ERFIS system and they have the ability to rapidly return the system to operational status. The NRC noted that a technician initially wrote a work ticket on the January 21, 1993, which identified the failed "switcher." The work ticket did not prevent another technician from activating the "switcher" on the morning of January 26, 1993, which, as stated by the licensee, was the source of the EOF ERFIS terminal failure. The Specialist contacted on the evening of January 26, 1993, was unable to activate the EOF ERFIS terminals. Neither the Specialist nor the technician contacted by the Specialist were aware of the defective equipment. The equipment was not returned to service until the following day after a review by the technician who normally works on the equipment. The activation of the "switcher" by a technician resulted in the EOF ERFIS terminals being inoperable for a period of 12 hours.

NRC Conclusion

The inspector concluded that the long standing problems with the ERFIS system had not been adequately resolved in the intervening years between June 1991 and January 1993.

After careful review and consideration of the licensee's basis for the denial of Violation A, Example 2, the NRC has concluded the violation as stated is valid.

