

# PRIORITY 1

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 AUTH. NAME      AUTHOR AFFILIATION  
 ROBINSON, W.R.      Carolina Power & Light Co.  
 RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 940916 ltr re violations noted in Insp Rept  
 50-400/94-17. Corrective actions: EDG B tested to verify  
 operability status & to implement increased test frequency  
 of once per seven days on staggered test basis for EDGs.

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Carolina Power & Light Company  
PO Box 165  
New Hill NC 27562

William R. Robinson  
Vice President  
Harris Nuclear Plant

OCT 17 1994

File: HO-941084

Serial: HNP-94-080  
10 CFR 2.201

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

SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

Attached is Carolina Power & Light Company's reply to the Notice of Violation described in Enclosure 1 of your letter dated September 16, 1994.

Questions regarding this matter may be referred to Mr. D. C. McCarthy at (919) 362-2100.

Sincerely,

W. R. Robinson

MGW:dmw-

Attachment

c: Mr. S. D. Ebnetter (NRC-RII)  
Mr. S. A. Elrod (NRC-SHNPP)  
Mr. N. B. Le (NRR)

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**REPLY TO A NOTICE OF VIOLATION  
NRC INSPECTION REPORT NO. 50-400/94-17**

Reported Violation A:

Technical Specification 4.8.1.1.2.a. requires that each emergency diesel generator shall be demonstrated operable in accordance with the frequency specified in Table 4.8-1 on a staggered test basis. Technical Specification 1.36 defines staggered test basis as a test schedule for designated components obtained by dividing the specified test interval into equal subintervals; and the testing of one designated component at the beginning of each subinterval.

Table 4.8-1, Diesel Generator Test Schedule, states that the test frequency shall be once per seven days if the number of failures is equal to or greater than two in the last 20 valid tests.

Contrary to the above, during the week of August 1, 1994 the "B" emergency diesel generator was not demonstrated operable once per seven days following two previous failures. Furthermore, during the week of August 8, 1994, following identification that the "A" emergency diesel generator was likewise required to be tested at the same frequency, the diesel generators were not demonstrated operable at the once-per-seven-day interval on a staggered test basis.

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

Denial or Admission:

The violation is admitted.

Reason for the Violation:

The violation occurred due to inadequate procedures and administrative controls. Implementing procedures did not clearly define valid test and test failure criteria, nor did they ensure timely evaluation of test failure information to identify the need for increasing emergency diesel generator (EDG) testing frequency. The failure to properly identify and implement testing on a staggered test basis was caused by an oversight during initial development of the site's computerized Surveillance Test Scheduling System (STSS). EDG testing at a weekly frequency was not identified in the STSS program as a staggered test.

Corrective Steps Taken and Results Achieved:

Immediate corrective actions were to test the "B" EDG to verify its operability status and to implement an increased test frequency of once per seven days on a staggered test basis for both EDGs. This action was completed on August 17, 1994.

Corrective Steps Taken to Prevent Further Violations:

Enhancements have been made to the STSS program to ensure appropriate EDG testing. Both the monthly and accelerated weekly testing are now scheduled and tracked on a staggered test basis. A review of the STSS program has been completed to ensure other technical specification staggered test requirements are identified and properly incorporated into the program.

EDG Operating Procedure OP-155, Technical Support Test Result Evaluation Procedure TMM-400, and EDG Reliability Program Procedure PLP-113 have been revised to enhance the process for evaluating EDG test failures. A caution note was also added to OP-155 to ensure operations personnel are aware of the staggered test requirement for EDG testing.

Appropriate Operations and Work Control personnel have been trained on this event to ensure a thorough understanding of staggered test requirements.

Date When Full Compliance Will Be Achieved:

The corrective steps stated above were completed on October 14, 1994.

Reported Violation B:

Technical Specification 6.8.1.d requires that written procedures be established, implemented, and maintained covering emergency plan implementation.

Emergency plan implementing procedure PEP-407, Maintenance of the HNP Emergency Response Organization, Section 9.4, states that emergency response personnel shall complete all the necessary requirements for respirator issue (physical, training, and respirator fit), if required for their position. Section 9.5 of this procedure further requires that these personnel will ensure their qualifications are kept current.

The official Emergency Response Organization Roster, which became effective July 11, 1994, lists operations personnel assigned to the positions of site emergency coordinator - control room, operations leader, and emergency communicator (control room): and indicates that those individuals are required to be qualified on a full face respirator and a self-contained breathing apparatus.

Contrary to the above, on August 15, 1994, seven licensed and non-licensed operators, who were designated to fulfill emergency response organization positions, were not qualified to wear respirators or self-contained breathing apparatus.

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

Denial or Admission:

The violation is admitted.

Reason for the Violation:

Respirator "qualification" is composed of three (3) parts: medical screening, respirator training and a respirator fit test. These three parts have previously been accomplished throughout a calendar year, thus leading to several dates being required to be met by individuals to be fully qualified. Additionally, no audit was performed to check the respirator qualification of emergency response organization (ERO) personnel, except on an annual basis, thus allowing individuals to exceed their twenty-five percent grace period before being detected.

Corrective Steps Taken and Results Achieved:

Individuals assigned to ERO positions requiring respirator qualification have been verified as being respirator qualified. Those individuals who are not qualified will not be used to meet minimum ERO staffing requirements.

Corrective Steps Taken to Prevent Further Violations:

Access Authority personnel will each month identify and notify personnel requiring respirator requalification during the next month. Additionally, Access Authority will identify personnel who did not requalify during the previous month, but should have done so. A listing of these personnel will be forwarded to the Emergency Preparedness Unit. Emergency Preparedness will contact the individual's supervisor informing him/her that at the end of the grace period, the employee who exceeded the requalification time interval for respirators will be identified in the next quarterly update of the site ERO roster, as not being fully qualified to fill their assigned ERO position.

Date When Full Compliance Will Be Achieved:

The corrective steps stated above were completed on October 17, 1994.