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

SUBJECT: Responds to NRC 941208 ltr re violations noted in insp rept
 50-400/94-23. Corrective actions: 1B-SB battery operability
 restored on 941117 by performing single cell charge. Also,
 monthly & quarterly interval maintenance procedures revised.

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Vice President
Harris Nuclear Plant

JAN - 6 1995

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Serial: HNP-95-002
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 (NRC Inspection Report No. 50-400/94-23)

Gentlemen:

Attached is Carolina Power & Light Company's reply to the Notice of Violation described in Enclosure 1 of your letter dated December 8, 1994.

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

Sincerely,


W. R. Robinson

MV

Attachment

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

9501170067 950106
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**REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/94-23**

Reported Violation A:

Technical Specification 3.8.2.1 requires, in part, that 125-volt Emergency Battery bank 1B-SB shall be operable in Modes 1 through 4.

Technical Specification 4.8.2.1.b.1 requires, in part, that each 125-volt Emergency Battery and charger shall be demonstrated OPERABLE at least once per 92 days by verifying that the parameters in table 4.8-2 meet the category B limits described in the table.

Technical Specification Table 4.8-2, Battery Surveillance Requirements, specifies a category B float voltage limit of ≥ 2.13 volts and an allowable value of > 2.07 volts for each connected cell. The applicable table notation states that, for any category B parameter outside the limit shown, the battery may be considered operable provided that the category B parameters are within their allowable values and provided the Category B parameters are restored to within limits within 7 days.

Contrary to the above, on October 19, 1994, the Emergency Battery 1B-SB cell voltage fell below the Category B limit of 2.13 volts during a surveillance. No action was taken until November 16, 1994 to restore this parameter to the required value. This resulted in the 1B-SB Emergency Battery Bank being inoperable for three weeks.

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

Denial or Admission:

The violation is admitted.

Reason for the Violation:

The condition identified on November 16, 1994, was evaluated by an Event Review Team. Their evaluation determined that the cause for the violation was a combination of a deficient test procedure and poor work practices on the part of those involved in performing and reviewing the tests. The Quarterly Safety Related Battery Maintenance Surveillance Test, (MST-E0011), included a table and table notations that were very ambiguous. They have led to an unclear understanding of test acceptance criteria and of what actions are needed if values are obtained between the acceptance limits and minimum allowable values. Poor work practices on the part of personnel performing this testing also contributed. These work practices involved routinely working to the procedure data sheets instead of the contained step-by-step guidance and that personnel performing the tests exhibited insufficient awareness of the impact of their actions. The review of completed test documentation, which is performed by electrical maintenance supervisory personnel, did not consistently identify that TS actions were required.

Corrective Steps Taken and Results Achieved:

1. 1B-SB Battery Operability was restored on November 17, 1994 by performing a single cell charge that raised the voltage of cell #50 to above 2.13 volts.
2. The monthly and quarterly interval Maintenance Surveillance Test Procedures, (MST-E0011 & MST-E0010) have been revised to clarify the acceptance criteria and the actions needed when parameters fall between the TS "acceptance limit" and the "minimum allowable value".

Corrective Steps Taken to Prevent Further Violations:

In addition to the above described items, training will be performed for maintenance personnel that perform and review MST-E0011 and MST-E0010, to enhance their understanding of procedural and Technical Specification requirements.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by March 31, 1994, with the completion of the maintenance personnel training.