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Carolina Power & Light Company PO Box 165 New Hill NC 27562 JAN 1 2 1996 William R. Robinson Vice President Harris Nuclear Plant

U.S. Nuclear Regulatory Commission ATTN: NRC Document Control Desk Washington, DC 20555 Serial: HNP-96-006 10CFR50.73

SHEARON HARRIS NUCLEAR POWER PLAN'T UNIT 1 DOCKET NO. 50-400 LICENSE NO. NPF-63 LICENSEE EVENT REPORT 95-014-00

Gentlemen:

In accordance with Title 10 to the Code of Federal Regulations, the enclosed Licensee Event Report is submitted. This report concerns a condition that existed while performing surveillance testing in April of 1994, during refueling outage 5, which resulted in the Residual Heat Removal System being inoperable for a short period. This inoperability condition constitutes a violation of Technical Specifications.

Sincerely,

Jur & Palinson

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Enclosure

c: Mr. S. D. Ebneter (NRC - RII) Mr. N. B. Le (NRC - PM/NRR) Mr. D. J. Roberts (NRC - HNP)

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On April 24, 1994, while in refueling outage 5, the Residual Hear Removal Pump (RHR) control power fuses were removed as procedurally directed during surveillance testing. With the plant in Mode-6 (Refueling) and refueling cavity water level less than 23 feet, both RHR loops are required to be operable. Harris Plant Technical Specification (TS) Interpretation #90-1 provides additional guidance on RHR system operability and states that one RHR train is allowed to be removed from service as long as it is "capable of being manually aligned to the Reactor Coolant System and started from the main control board." With RHR pump control power fuses removed one at a time during testing, action outside the main control room would have been necessary to start the pump, thus resulting in a violation of RHR system TS operability requirements.

This condition was identified on September 30, 1995, during refueling outage 6, when Operations personnel performing the same RHR system testing, recognized that compliance with the surveillance procedural steps would result in a violation of TS requirements for RHR system operability. To avert this condition, testing was rescheduled and satisfactorily completed at a later time when the plant was in Mode-5 (Cold Shutdown), when TS allow a two hour inoperability period for surveillance testing. The cause of this event was procedural inadequacies, in that specific procedure steps directed the removal of RHR pump control power without considering the operability impact while in Mode-6 with cavity water level less than 23 feet. Corrective action included revising the deficient procedure.

NRC FORM 366A

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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EVENT DESCRIPTION:

On April 24, 1994, during refueling outage 5, with the plant in Mode-6 (Refueling), surveillance testing to verify the operability of Residual Heat Removal (RHR) System (EIIS Code: BP, CKV) check valves was in progress (OST-1508). As directed by OST-1508 procedure steps, the control power fuse was removed from the "A" Residual Heat Removal (RHR) pump (EIIS Code: BP, P) for approximately 21 minutes and then the "B" RHR pump for approximately 22 minutes (one at a time) to support testing. With the plant in Mode-6 with refueling cavity water level less than 23 feet, TS 3.9.8.2 requires both trains of RHR to be operable. Harris Plant TS Interpretation #90-1 provides additional guidance on RHR system operability for Mode-6 operation and states that one RHR train is allowed to be removed from service as long as it is "capable of being manually aligned to the Reactor Coolant System and started from the main control board." With control power fuses removed from either RHR pump, action outside the main control room would have been necessary to start the pump, thus resulting in a violation of RHR system TS operability requirements.

This condition was identified on September 30, 1995, during refueling outage 6 when operations personnel performing the same RHR surveillance test recognized that compliance with sections 7.3.2 and 7.4.2 of OST-1508, which directed the removal of control power fuses from the "A" and "B" RHR pumps, would result in a violation of TS requirements for RHR system operability. To avert this condition, sections 7.3.2 and 7.4.2 of OST-1508 were rescheduled and satisfactorily completed at a later time when the plant was in Mode-5 (Cold Shutdown), when TS allow a two hour inoperability period for surveillance testing. Subsequent review of previous performances of OST-1508 revealed the above described TS violation that occurred in April of 1994 during refueling outage 5. An extensive operability / reportability evaluation was performed, which concluded on December 14, 1995, that this condition did violate the requirements of TS 3.9.8.2 and Harris Plant TS Interpretation #90-01.

CAUSE:

The cause of this event was procedural inadequacies, in that specific procedure steps directed the removal of RHR pump control power fuses without considering the operability impact while in Mode-6 with cavity water level less than 23 feet. Due to the fact that the TS violation occurred 18 months prior to the investigation, contributing factors were difficult to determine, but had operations personnel performing the test in 1994 displayed the questioning attitude that resulted in identifying the procedure deficiency during the recent testing in 1995, the event may have been prevented.

SAFETY SIGNIFICANCE:

There were no significant safety consequences as a result of this event. One train of RHR was available and in operation to remove decay heat and the other train could have been restored in a short period of time by re-installing the pump control power fuses if needed.

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PREVIOUS SIMILAR LERs:

No similar LERs have been reported pertaining to an inoperable RHR train during Mode-6 operation.

CORRECTIVE ACTIONS PLANNED:

Operation Surveillance Test OST-1508 will be revised to correct the procedure deficiency prior to its next use. This revision will be completed by February 15, 1996.

EIIS CODES:

Residual Heat Removal System - BP Component Codes: RHR Pump - P, Check Valves - CKV