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

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SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1 DOCKET NO. 50-400 LICENSE NO. NPF-63 LICENSEE EVENT REPORT 96-004-00

Gentlemen: *

In accordance with Title 10 to the Code of Federal Regulations, the enclosed Licensee Event Report is submitted. This report relates to a freezing event involving two Refueling Water Storage Tank (RWST) level transmitters, resulting in entry into Technical Specification Limiting Condition for Operation (LCO) 3.0.3, and a subsequent procedural error which caused a violation of a Technical Specification action statement.

Sincerely,

J. W. Donahue General Manager Harris Plant

RWP₁

Enclosure

c: Mr. S. D. Ebneter (NRC - RII) Mr. N. B. Le (NRC - PM/NRR) Mr. D. J. Roberts (NRC - HNP) 7603110607 760306 PDR ADUCK 05000400 S PDR 1101111

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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) On February 5, 1996 the plant was operating in Mode 1 with Reactor Power at 100%. At approximately 0335																
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NRC FORM 366A

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET	LER NUMBER (6) PAG					AGE (3)		
Harris Nuclear Plant - Unit 1	50-400	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2	OF	4		
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EVENT DESCRIPTION:

On February 5, 1996, the plant was operating in Mode 1 with reactor power at 100%. At approximately 0335 Refueling Water Storage Tank (RWST) Level Transmitter (EIIS Code BQ-LT) LT-991 failed high due to a frozen sensing line and was declared inoperable. The transmitter was placed in the bypassed condition at 0418 to meet Technical Specification Limiting Condition for Operation (LCO) 3.3.2 Action Statement #16. (This involved placing a Process Instrumentation Control (PIC) card bistable switch in the test position and lifting a lead/jumper.) This action changes the coincidence logic for the RWST Low-Low Level switchover sequence from 2 of 4 to 2 of 3.

At approximately 0815, a second RWST Level Transmitter (LT-990) indication started to trend upward due to a freezing sensing line. It went into high alarm at 0845 and was declared inoperable at approximately 0900. With only 2 of 4 channels operable, the plant was unable to comply with the LCO action statement. Thus, Technical Specification LCO 3.0.3 was entered, requiring action to bring the plant to a shutdown condition within the following seven hours. Initial investigation of this condition noted missing insulation on the transmitters' sensing line drains. External heating was applied to thaw the transmitters. At approximately 1122, LT-990 was satisfactorily channel checked and declared operable, thus exiting the LCO 3.0.3. LT-991 was declared operable at 1406 the following day (February 6, 1996) after a channel calibration was completed.

Also on February 5, 1996, at approximately 1000, while restoring Main Control Board (MCB) indication for transmitter LT-991, a procedure step returned the PIC card bistable switch to the normal position from the test position. This action removed the bypassed condition of LT-991, violating the Technical Specification LCO 3.3.2 Action Statement #16. (The procedure was incorrect in stating that the step could be completed to allow trouble shooting without affecting the bypassed condition of the instrument. The procedure error was introduced during a November 1995 revision.) At approximately 0930 on February 6, 1996, maintenance personnel identified the procedure error and restored the channel to the bypassed condition as required by the LCO. The LCO action statement was violated for approximately 23.5 hours. As noted above, LT-991 was declared operable at 1406 on February 6, 1996.

CAUSE:

The cause of the transmitter freezing event was a combination of ineffective construction controls which resulted in heat trace not being installed per design, failure to restore insulation after maintenance, and insulation type not being adequate for wet locations. The significance of missing insulation was not sufficiently understood. Additionally, Operations personnel did not act sufficiently to prevent freezing of the second transmitter sensing line. The cause of the procedure error was inadequate self checking during the revision process to ensure that the intended action was correct, including not referencing required drawings.

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SAFETY SIGNIFICANCE:		e ,								
There were no adverse safety consequences as a result of the										
minimizes the redundancy of the inputs that initiate the RW										
the transmitters not in service, the 2 of 4 coincidence logic										
transmitters were capable of initiating the RWST Low-Low required, the Emergency Operating Procedure (EOP) networe										
switchover. When the bypass was unknowingly removed f										
restored to the original 2 of 4 coincidence logic. An Engine										
instrument was functional and that the instrument loop was			unction when							
its MCB indication was restored by returning the switch to	the normal posit	on.								
These events are being reported per 10CFR50.73(a)(2)(i) at	nd 10CFR50.73(a)(2)(vii).	1 ¹							
PREVIOUS SIMIL'AR EVENTS:		,								
There have been no LERs which have resulted in the simult	aneous loss of m	ore than one RWST level tr	ansmitter.							
However, there were prior freeze events associated with in										
and 1995. Prior corrective actions were ineffective becaus	•	n the transmitters themselv	es and failed							
to detect the source of the problem in the sensing line drain	1.									
Regarding the incorrect procedure, LER 95-009 was submit	ted November 3	. 1995, relating to the unan	ticipated							
actuation of Engineered Safety Features (ESF) components	during Refueling	Outage #6. Corrective act	ion included							
the revision of the procedure review and approval process	Plant Procedure	AP-006) to specify the use	of multi-							
discipline technical reviews when warranted. The AP-006										
1995) as the RWST procedure revision. Thus the correctiv	e action to utilize	e the multi-discipline technic	cal reviews							
was not incorporated into the RWST procedure revision whe cause investigation into human performance issues (CR 95	(Ch caused this (.01474) identifie	d inappropriate procedure re	evisions.							
Corrective actions are still in progress.			3413101101							
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<u>CORRECTIVE ACTIONS COMPLETED</u>: 1. Missing insulation was replaced and the sensing lin	es were thawed.									
2. Plant history was reviewed for previous freezing pro-	oblems, and a w	alkdown of critical compone	ents was							
performed to identify potential short term freezing of			vere provided							
to Operations, and an Operations Night Order was	subsequently iss	ueu.								
3. The OWP-ESF procedure was corrected by removin	g the steps that	caused the bypassed condi	tion of the							
level channel to be inadvertently removed.	- 8									
4. Disciplinary action has been taken for the incorrect	procedure chang	je.								
5. The OWP-ESF procedure was revised to allow resto	vertion of MCP in	dication for trouble shootin	a while still							
5. The OWP-ESF procedure was revised to allow restant maintaining the channel in the bypassed condition.			a mile sui							
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	ECTIVE ACTIONS COMPLETED (cont):								
6.	Operations procedure changes which require a review	v by Engineeri	ing prior to approval have bee	en identified."					
7.	The adverse weather procedure (AP-301) was revise	d to incornora	ta annronriata racommandati	one related to					
/.	RWST level transmitter insulation verification and use								
	Time in and as								
8.	An Event Review Team has been established to deter	mine other ad	ctions required to ensure futu	re Operations					
	procedure revisions are correct.								
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	ECTIVE ACTIONS PLANNED:	معاما أممارهم	whether type will be sherred	to o turo that					
1.	The heat trace configuration and wattage will be upg			to a type that					
	will not absorb water, and the insulation configuratio removal/replacement by August 31, 1996.	n will be chai							
	removal/replacement by August 31, 1990.		r						
2.	Appropriate maintenance surveillance tests will be revised to include verification that drain valve insulation is								
	reinstalled by April 8, 1996.								
3 .	The adverse weather procedure (AP-301) will be furt	her revised to	incorporate priority equipme	nt					
	identification and control and more specific walkdow	n/inspection g	juidance by April 8, 1996. A	requirement					
1	to perform an annual self assessment of operating ex		ons learned from the previous	s year at HNP					
	and the industry will also be included in this revision.	•	•						
4.	Operator Rounds Guidance regarding RWST pit pump	o/drain down	prior to the water level reach	ina the					
.	transmitter sensing line insulation will be revised and								
	March 15, 1996.		····						
	•	ı							
5.	Implementation procedures for complying with Tech	nical Specifica	ition action statements relate	d to the					
- -	Engineered Safety Features Actuation System, React	or Protection	System, and Radiation Monit	oring System					
	will be reviewed by April 8, 1996.								
	· Recently revised surveillance procedures with a quar	torly fraguasa	w or longer will be reviewed	for toobnical					
6.	accuracy prior to next performance. This action will	continue unti	the Event Beview Team disc	russed in					
	Corrective Actions Completed Item #8 above present								
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EIIS CODES:									
Refue	ling Water Storage Tank (RWST) Level Transmitter (BC	2-LT)							
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