

CATEGORY 1

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 ROBINSON, W.R. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards response to NRC 960409 ltr re violations noted in insp rept 50-400/96-02. Corrective actions: completed review of implementation procedures for complying TS action statements re ESFA sys & reactor protection sys.

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NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company
PO Box 165
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William R. Robinson
Vice President
Harris Nuclear Plant

MAY - 9 1996

SERIAL: HNP-96-080

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 NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 50-400/96-02)

Gentlemen:

Attached is Carolina Power & Light Company's reply to the Notice of Violation described in Enclosure 1 of your letter dated April 9, 1996.

Questions regarding this matter may be referred to Mr. T. D. Walt at (919) 362-2711.

Sincerely,

William R. Robinson

MGW

Attachment

c: Mr. J. B. Brady
Mr. S. D. Ebnetter
Mr. N. B. Le

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REPLY TO NOTICE OF VIOLATIONS
NRC INSPECTION REPORT NO. 50-400/96-02

Reported Violation:

Technical Specification 6.8.1.a requires written procedures to be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Items 1.a and 8.b reference procedures for bypassing safety functions and for surveillance tests listed in the technical specifications, respectively.

1. Contrary to the above, on February 5, procedure OWP-ESF-05, Revision 4, Operations Work Procedure - Engineered Safety Feature Actuation, was inadequate in that it contained a note stating that returning the trip switch to NORMAL did not affect the bypassed condition of the level channel. The procedure resulted in Refueling Water Storage Tank level channel LT-0991 being returned to service (un-bypassed) after being declared inoperable. This caused a violation of Technical Specification 3.3.2 Action Statement #16 which stated, in part, that with the number of OPERABLE channels one less than the Total Number of Channels, operation may proceed provided the inoperable channel is placed in the bypassed condition.
2. Contrary to the above, on February 26, 1996, temporary testing procedure OST-9017T, Revision 0, Temporary Procedure to Test Control Room Isolation 18 Month Interval, was inadequate in that it swapped contacts specified for jumper installation during control room ventilation system testing. This caused the actuation of "B" train Control Room Emergency Ventilation System during the "A" train portion of the test.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

Example 1:

This information was contained in previously submitted Licensee Event Report (LER) 96-004-01, dated April 4, 1996.

Example 2:

The technical inaccuracies contained in procedure OST-9017T, Revision 0, were due to inadequate information validation/verification by the procedure writers and reviewers.

Corrective Steps Taken and Results Achieved:

Example 1:

This information was contained in previously submitted LER 96-004-01, dated April 4, 1996. The status of corrective actions specific to this violation which were not completed at the time of the LER submittal is as follows:

1. Review of implementation procedures for complying with Technical Specification action statements related to the Engineered Safety Features Actuation System, Reactor Protection System, and Radiation Monitoring System was completed by April 25, 1996. No significant technical concerns were identified, however procedure enhancements were recommended.
2. Recently revised surveillance procedures with a quarterly frequency or longer were reviewed for technical accuracy by April 30, 1996. This review included Operations surveillance procedures scheduled for performance between March 11 and May 19, 1996 which had been revised (excluding administrative changes) since the last performance. These procedures were revised as necessary prior to performance.

Additional corrective steps taken include the following:

1. Operations procedure writers have been counseled on the error trends associated with procedures in the Operations unit.
2. Personnel rotation was performed to enhance the combined skill set of the procedure writer staff.

Example 2:

1. OST-9017T was revised on February 27, 1996, to specify the correct contacts for jumper installation.
2. The individuals involved in writing and reviewing test procedure OST-9017T were counseled on the importance of information validation and verification during procedure writing and reviews. This action was completed by April 24, 1996.

Corrective Steps That Will Be Taken to Avoid Further Violations:

Example 1:

1. Expectations for the use of Human Error Prevention/Reduction techniques will be added to the incumbent Operations procedure writers and coordinators accountabilities by May 16, 1996.
2. Individual procedure writer performance is being closely monitored to identify errors made in the review, revision or development of procedures. A follow-up assessment will be conducted after six months to determine if further actions are required.

Corrective Steps That Will Be Taken to Avoid Further Violations:(continued)

Example 2:

A Real Time Training package will be provided to appropriate operations personnel on verification of train components during procedure writing and reviews. The package will include a discussion of this event. This action will be completed by May 24, 1996.

Date When Full Compliance Was Achieved:

Example 1:

Full compliance was achieved on March 5, 1996, with the approval of OWP-ESF Revision 7.

Example 2:

Full compliance was achieved on February 27, 1996, with the approval of OST-9017T, Revision 0/1.