

CATEGORY

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESIÓN NBR: 9705290267 DOC.DATE: 97/05/22 NOTARIZED: NO DOCKET #
 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
 AUTH.NAME AUTHOR AFFILIATION
 VERRILLI, M. Carolina Power & Light Co.
 DONAHUE, J.W. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 97-011-00: on 970422, inappropriate TS interpretation resulted in violations of ECCS accumulator TS & entry into TS 3.0.3. Caused by procedural inadequacy. TSI 88-001 cancelled 970508 & procedures revised. W/undated ltr.

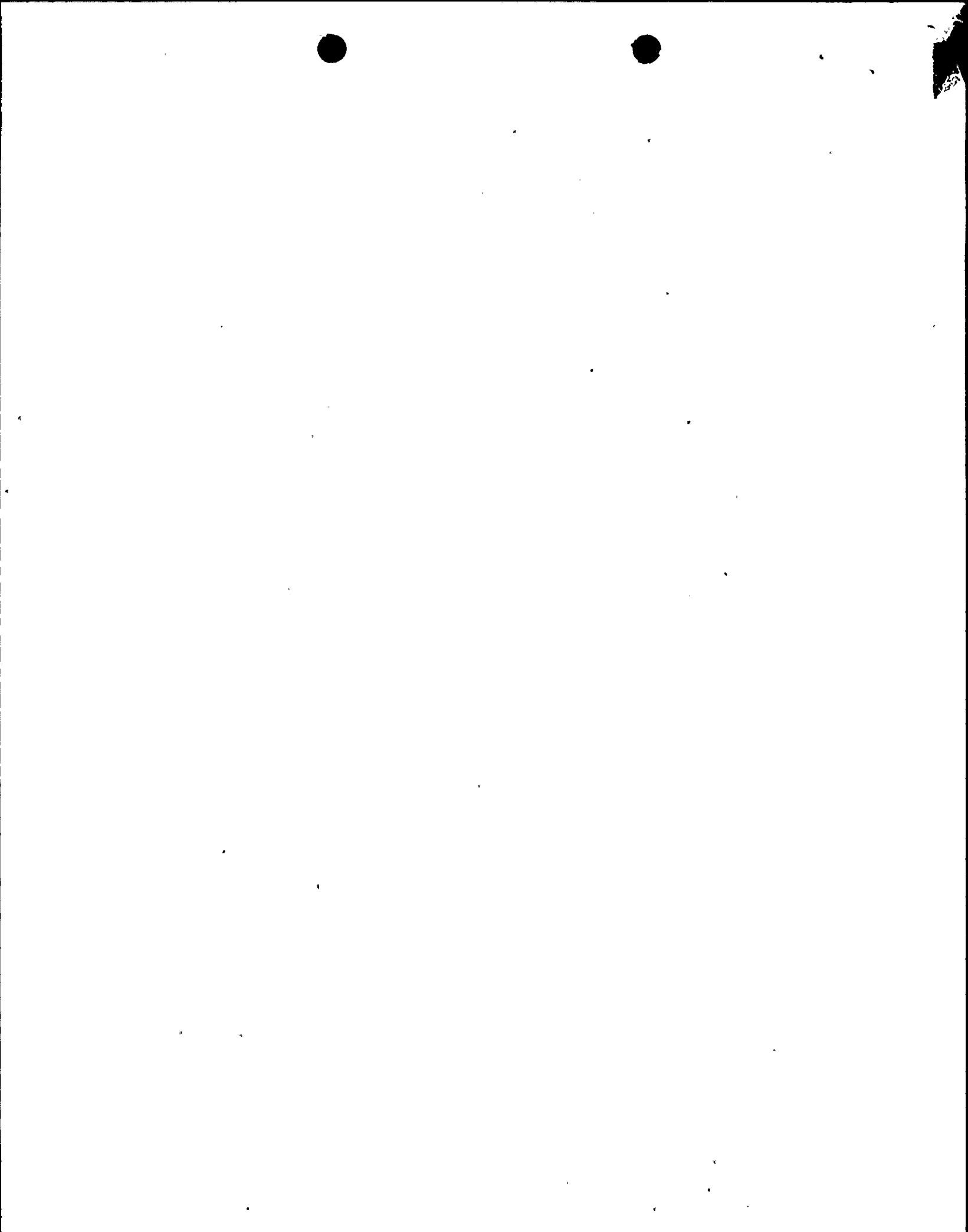
DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: Application for permit renewal filed. 05000400

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	
	PD2-1 PD	1 1	ROONEY, V	1 1	
INTERNAL:	ACRS	1 1	AEOD/SPD/RAB	2 2	
	AEOD/SPD/RRAB	1 1	FILE CENTER	1 1	
	NRR/DE/ECGB	1 1	NRR/DE/EELB	1 1	1
	NRR/DE/EMEB	1 1	NRR/DRCH/HHFB	1 1	
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1	
	NRR/DRCH/HQMB	1 1	NRR/DRPM/PECB	1 1	
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SRXB	1 1	D
	RES/DET/EIB	1 1	RGN2 FILE 01	1 1	
EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE, J H	1 1	O
	NOAC POORE, W.	1 1	NOAC QUEENER, DS	1 1	C
	NRC PDR	1 1	NUDOCS FULL TXT	1 1	U

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL DESK (DCD) ON EXTENSION 415-2083

FULL TEXT CONVERSION REQUIRED
 TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 25





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

William R. Robinson
Vice President
Harris Nuclear Plant

MAY 22 1997

U.S. Nuclear Regulatory Commission
ATTN: NRC Document Control Desk
Washington, DC 20555

Serial: HNP-97-112
10CFR50.73

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1
DOCKET NO. 50-400
LICENSE NO. NPF-63
LICENSEE EVENT REPORT 97-011-00

Sir or Madam:

In accordance with Title 10 to the Code of Federal Regulations, the enclosed Licensee Event Report is submitted. This report describes a conflict between a Technical Specification Surveillance Requirement and a Technical Specification Interpretation. This conflict resulted in Technical Specification violations on three separate occasions.

Sincerely,

J. W. Donahue
Director of Site Operations
Harris Plant

MSE/mse

Enclosure

- c: Mr. J. B. Brady (HNP Senior NRC Resident)
- Mr. L. A. Reyes (NRC Regional Administrator, Region II)
- Mr. N. B. Le (NRC - NRR Project Manager)

IEE22/1



9705290267 488
110031

U.S. Nuclear Regulatory Commission
Document Control Desk / HNP-97-112
Page 2 of 2

bcc: Mr. T. C. Bell
Mr. H. K. Chernoff (RNP)
Mr. B. H. Clark
Mr. G. W. Davis
Ms. S. F. Flynn
Ms. J. P. Gawron (BNP)
Mr. H. W. Habermeyer
Mr. M. D. Hill
Mr. W. J. Hindman
Ms. C. W. Hobbs (HEEC)
Mr. M. B. Keef
Mr. R. M. Krich
Ms. W. C. Langston
Mr. C. W. Martin (BNP)
Mr. R. D. Martin
Mr. J. W. McKay
Mr. B. A. Meyer
Mr. P. M. Odom (RNP)
Mr. W. R. Robinson
Mr. G. A. Rolfson
Mr. R. F. Saunders
Mr. C. N. Sweely
Mr. M. A. Turkal (BNP)
Mr. R. L. Warden (RNP)
HNP Real Time Training
INPO
Harris Licensing File
Nuclear Records

FACILITY NAME (1) Shearon Harris Nuclear Plant, Unit-1	DOCKET NUMBER (2) 50-400	PAGE (3) 1 OF 3
---	-----------------------------	--------------------

TITLE (4)
Inappropriate Technical Specification Interpretation resulted in violations of ECCS Accumulator Technical Specification and entry into Technical Specification 3.0.3.

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
04	22	97	97	-- 011	-- 00	05	22	97		
OPERATING MODE (9)		6	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)		000	20.2201(b)			20.2203(a)(2)(v)			X 50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(iii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(ii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(iii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Mike Verrilli Senior-Analyst- Licensing	TELEPHONE NUMBER (Include Area Code) (919) 362-2303
---	--

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 22, 1997 with the plant at 0% power in Mode 6 Refueling, investigation determined the "A" ECCS Accumulator had been inoperable approximately 14 hours on December 10, 1996 and 46 hours from March 20, 1997 to March 22, 1997. Also on March 21, 1997, the "B" ECCS Accumulator was inoperable from 0255 to 0337. During these periods, the plant was operating at 100% power with the ECCS Accumulators required to be operable. The "A" ECCS Accumulator was not declared inoperable and consequently the Technical Specification (TS) 3.5.1 required actions were not taken. The LCO Action times were exceeded for the "A" ECCS Accumulator in both these examples, resulting in a violation of TS 3.5.1. Failure to take the required action for the "A" ECCS Accumulator was due to inappropriate interpretation of TS Surveillance Requirement (SR) 4.5.1.1.a.1. This SR verifies proper accumulator pressure and level by the absence of alarms. A TS Interpretation (TSI 88-001) was in place to allow manual logging of accumulator level or pressure when the respective alarm was sealed in or otherwise inoperable. TS 3.5.1 Action a. requires the plant to be in Hot Standby within 7 hours of accumulator inoperability for inadequate level or pressure. The "A" ECCS Accumulator inoperability coincided with the "B" ECCS Accumulator inoperability on March 21, 1997, requiring entry into TS 3.0.3. The "B" ECCS Accumulator was inoperable due to connections with non-seismically qualified piping while filling from and draining to the Refueling Water Storage Tank (RWST).

HNP has taken the following corrective actions in response to these events: (1) cancelled TSI 88-001; (2) revised procedures that referenced TSI 88-001 and (3) initiated a Night Order informing Operations personnel of TSI 88-001 cancellation. HNP submitted a license amendment request on March 10, 1997 for NRC approval of this alternate method of operability verification. HNP will review other TSI's for other potential TS conflicts.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Shearon Harris Nuclear Plant - Unit 1	50-400	97	11	00	2 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT DESCRIPTION:

On April 22, 1997, with the plant at 0% power in mode 6, investigation determined the "A" ECCS Accumulator (EIS code BQ ACC) had been inoperable for approximately 14 hours on December 10, 1996 and 46 hours from March 20, 1997 to March 22, 1997. During these periods, the "A" ECCS Accumulator High-Low Level alarm (EIS code IB LA) was sealed in due to reaching the low alarm setpoint of 67.5%. The alarm setpoint is above the TS requirement of 66%.

TS Surveillance Requirement 4.5.1.1.a.1 specifies verification of absence of alarms as the method by which accumulator level and pressure are determined to be within TS limits. OST-1021 (Modes 1 and 2) and OST-1022 (Modes 3 and 4), "Daily Surveillance Requirements", implement this surveillance requirement.

However, TSI 88-001 read "In the case where such an alarm is sealed in or otherwise inoperable, yet the operable indicators show that the parameters are in spec, increased surveillance and logging may be done instead of declaring the applicable accumulator inoperable". This alternate method of verifying accumulator pressure and level was determined to be contrary to TS. Annunciator procedure, ALB-001-7-2, required manual logging of "A" ECCS Accumulator level (EIS code BQ LI) to verify that it remained within the TS limits. For both periods in December 1996 and March 1997, when the alarm was sealed in, the "A" ECCS Accumulator level was logged every 30 minutes and verified within TS limits by MCB indication. Decreases in accumulator level are expected due to normal sampling, which requires purging the accumulator to the Primary Sample Panel (EIS code KN PL) for 10 minutes to obtain a representative sample. The loss of inventory requires filling the accumulators periodically.

The TS contradiction was identified after reviewing a cited violation at another facility for use of a similar TS Clarification.

On March 21, 1997, the "B" ECCS Accumulator was declared inoperable due to connections with non-seismically qualified piping while filling from and draining to the RWST (EIS code BE TK). The inoperability of "A" ECCS Accumulator was not recognized due to the TSI and therefore the TS 3.0.3 entry went unnoticed.

CAUSE:

This violation is due to a procedural inadequacy and an incorrect Technical Specification Interpretation that allowed an alternate method of performing a surveillance requirement. Changes to surveillance requirements must be submitted to and approved by the NRC.

SAFETY SIGNIFICANCE:

There were no adverse consequences as a result of these events. The method of performing the surveillance requirement in TSI 88-001 is approved by NUREG 1431 and Generic Letter 93-005. TSI 88-001 imposed a more conservative monitoring frequency of every 30 minutes than NUREG 1431 and Generic Letter 93-005, which require monitoring indications at least once per 12 hours. During the time "A" ECCS Accumulator High-Low Level alarm was sealed in, the lowest recorded level was above the required accumulator TS limit of 66%. Therefore, the "A" ECCS Accumulator would have been able to perform its safety function.

Also the "B" ECCS Accumulator remained functional with respect to minimum level, pressure, and boron concentration. Therefore, the "B" ECCS Accumulator could have performed its required function unless a seismic event had occurred.

This condition is being reported per 10 CFR. 73 a.2.i as a violation of Technical Specifications.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Shearon Harris Nuclear Plant - Unit #1	50-400	97	011	00	3 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

PREVIOUS SIMILAR EVENTS:

Inappropriate guidance for TS compliance was described in LER 97-005, dated March 17, 1997. In this event, a TS bases change inappropriately allowed operators to deviate from the actions required by the Limiting Condition of Operation. Specifically, the bases had been changed to allow averaging of reactor power to determine if flux mapping was required.

LER 97-008, dated May 5, 1997, described a condition in which a TSI was used to identify support equipment required for operability of TS required equipment. This TSI did not consider certain temperature switches to be required for operability of safety related equipment.

CORRECTIVE ACTIONS COMPLETED:

1. TSI 88-001 was cancelled on May 8, 1997.
2. The following procedures were revised to delete references to TSI 88-001: MST-I0110, MST-I0111, MST-I0112, MST-I0113, MST-I0114, MST-I0115 on May 12, 1997. ALB-001 was revised on May 18, 1997.
3. A Night Order was issued to inform Operations personnel of cancellation of TSI 88-001 on May 9, 1997

CORRECTIVE ACTIONS PLANNED:

1. Remaining TSIs will be reviewed for conflicts with Technical Specification Surveillance Requirements. If such conflicts are identified, appropriate corrective actions, including license amendment request, procedure change, and or cancellation of the interpretation, will be taken by October 1, 1997.