

# CATEGORY 1

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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 970424 ltr re violations noted in insp rept  
50-400/97-03. Corrective actions: submitted LER 97-005-00 on  
970317 & reviewed violation w/individuals involved to ensure  
understanding re indentification of reportable conditions.

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NOTES: Application for permit renewal filed.

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

William R. Robinson  
Vice President  
Harris Nuclear Plant

MAY 26 1997

SERIAL: HNP-97-104

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 VIOLATIONS (NRC INSPECTION REPORT NO. 50-400/97-03)

Dear Sir or Madam:

Attached is Carolina Power & Light Company's reply to the Notice of Violations described in Enclosure 1 of your letter dated April 24, 1997.

Questions regarding this matter may be referred to Ms. D. B. Alexander at (919) 362-3190.

Sincerely,



MGW/mgw

Attachment

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

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**REPLY TO NOTICE OF VIOLATIONS  
NRC INSPECTION REPORT NO. 50-400/97-03**

**Reported Violation A:**

Technical Specification 6.8.1.a requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Regulatory Guide 1.33, Appendix A, Section 6.p, requires written procedures for combating emergencies and other significant events such as fire in the control room or forced evacuation of the control room.

The Harris Plant Final Safety Analysis Report, Section 7.4, Systems Required for Safe Shutdown, included the motor-driven auxiliary feedwater pumps, the residual heat removal system, and the component cooling water system among those required to bring the plant to safe shutdown. It described these systems as having control capability from the Auxiliary Control Panel (outside the main control room).

Contrary to the above, as of March 29, 1997, the licensee failed to provide procedures for the operation of the motor-driven auxiliary feedwater pumps, the "A" train residual heat removal system, and the "A" train component cooling water system from the Auxiliary Control Panel following a forced evacuation of the main control room.

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

**Denial or Admission of Violation:**

The violation is admitted.

**Reason for the Violation:**

The violation occurred due to a misinterpretation in the application of single failure requirements for these safe shutdown systems. During development of Abnormal Operating Procedure AOP-004, Remote Shutdown, system components and train divisions that were included in the Harris Safe Shutdown Analysis were excluded from redundancy and certain single failure requirements with respect to safe shutdown following a fire related control room evacuation. It was not recognized that the motor-driven auxiliary feedwater (AFW) pumps, "A" train residual heat removal (RHR) system, and the "A" train component cooling water (CCW) system were required to meet single failure redundancy criteria for achieving safe shutdown following control room evacuations unrelated to a fire.



Corrective Steps Taken and Results Achieved:

Following the inspector's initial finding regarding the operation of the motor-driven AFW pumps from the ACP, a review of the Harris FSAR Section 7.4, Systems Required for Safe Shutdown, was conducted to determine if there were similar safe shutdown components that were not covered by procedure. The review resulted in the identification of several other components, including the "A" train RHR system, "A" train CCW system, "A" train boric acid transfer pump, "C" train steam generator power operated relief valve, and "A" train charging and safety injection pump, for which procedures were required to address operation from the ACP for safe shutdown with no fire. The procedures described below have been revised as a result of this review.

AOP-004, "Remote Shutdown," Revision 12, was approved on May 15, 1997 which incorporates instructions for operating components required for safe shutdown with no fire.

Operations Surveillance Test Procedure OST-1813, "Remote Shutdown System Operability - 18 Month Interval - Modes 5 or 6," Revision 7 was approved on April 2, 1997 to incorporate testing of components required for safe shutdown with no fire.

Corrective Steps That Will Be Taken to Prevent Further Violations:

No further actions required.

Date When Full Compliance Was Achieved:

Full compliance was achieved on May 15, 1997, with the completion of the procedure revisions as stated above.

Reported Violation B:

10 CFR 50.73, requires that a Licensee Event Report be submitted for items subject to the paragraph within 30 days after discovery of the event. Paragraph (a)(2)(i) includes any operation or conditions prohibited by the plant's Technical Specifications.

Contrary to the above, from March 3, 1997 until March 17, 1997, the licensee failed to submit a Licensee Event Report within 30 days of discovery of an operation prohibited by the plant's Technical Specification in that, on January 30, 1997, the licensee was aware that a failure to comply with Technical Specification 3.2.3 had occurred on March 20, 1996. The Licensee Event Report was not submitted until March 17, 1997.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

The violation occurred due to a failure to clearly establish and communicate the event discovery-date and required 30-day LER due date within the Licensing-Regulatory Programs Unit.

Corrective Steps Taken and Results Achieved:

LER 97-005-00 was submitted to the NRC on March 17, 1997 reporting the failure to comply with Technical specification 3.2.3.

This violation has been reviewed with the individuals involved to ensure a clear understanding exists related to the identification of reportable conditions and establishment of Licensee Event Report due dates. This action was completed on March 27, 1997.

Corrective Steps That Will Be Taken to Prevent Further Violations:

No further actions required.

Date When Full Compliance Was Achieved:

Full compliance was achieved on March 17, 1997 with submittal of LER 97-005-00.