

CATEGORY 1

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 AUTH. NAME AUTHOR AFFILIATION
 ROBINSON, W.R. Carolina Power & Light Co.
 RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to NRC 970718 ltr re violations noted in insp rept 50-400/97-06. Corrective actions: compliance was achieved on 970608 w/issuance of Operations Night Order.

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NOTES: Application for permit renewal filed. 05000400

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

William R. Robinson
Vice President
Harris Nuclear Plant

AUG 14 1997

SERIAL: HNP-97-146

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. 50-400/97-06)

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 July 18, 1997.

Questions regarding this matter may be referred to Mr. J. H. Eads at (919) 362-2646.

Sincerely,



MGW/mgw

Attachment

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

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**REPLY TO NOTICE OF VIOLATIONS
NRC INSPECTION REPORT NO. 50-400/97-06**

Reported Violation A:

Technical Specification 3.3.1 requires, as a minimum, that the Reactor Trip System instrumentation channels and interlocks of Table 3.3-1 shall be operable. Technical Specification Table 3.3-1 specifies a minimum of three Power Range Nuclear Instrumentation channels (out of four total) are required to be operable for the Neutron Flux High Positive Rate trip function, and that Action Statement 2 applies. Table 3.3-1 Action Statement 2 states, in part, that Power Operation may proceed with the number of operable channels one less than the total number of channels provided the inoperable channel is placed in the tripped condition within six hours and the minimum channels operable requirement is met. Table 3.3-1 Action 2b contains provisions for bypassing the inoperable channel for up to four hours for surveillance testing of the other channels per Specification 4.3.1.1.

Contrary to the above, on June 8, 1997, while performing surveillance testing per Specification 4.3.1.1, licensee personnel failed to restore inoperable Power Range nuclear instrumentation channel (N41) to operable status or bypass it prior to performing surveillance activities on one of the other three channels (N42, N43 or N44). The surveillance activity involved a course gain adjustment which input a false high positive rate trip on channel N42 coincident with N41 already being in an inoperable and tripped condition. This satisfied two-out-of-four logic and resulted in an automatic reactor trip from 28 percent power.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

This information was contained in previously submitted LER 97-016-00, dated July 8, 1997.

Corrective Steps Taken and Results Achieved:

This information was contained in previously submitted LER 97-016-00, dated July 8, 1997.

Corrective Steps That Will Be Taken to Prevent Further Violations:

This information was contained in previously submitted LER 97-016-00, dated July 8, 1997.

Date When Full Compliance Was Achieved:

Compliance was achieved on June 8, 1997 with the issuance of an Operations Night Order prohibiting adjusting the gain of a Power Range nuclear instrumentation channel when a redundant channel is inoperable.

Reported Violation B:

Technical Specification 6.5.1.1.1 requires a safety and a technical evaluation to be prepared for each procedure required by Technical Specification 6.8. This includes surveillance procedures for reactor protection system tests and calibrations [incorporated by reference in Regulatory Guide 1.33, Appendix A, item 8.b.(1)(I)].

Technical Specification 6.5.1.2.1 states that technical evaluations will be performed by personnel qualified in the subject matter and will determine the technical adequacy and accuracy of the proposed activity.

Contrary to the above, prior to May 14, 1997, the licensee failed to perform an adequate technical evaluation of maintenance surveillance test procedure MST-I0072, Revision 7, in that a deficiency was not identified, resulting in a single-train safety injection event. The safety injection resulted in approximately 126 gallons of refueling water storage tank water being gravity fed into the reactor coolant system.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

This information was contained in previously submitted LER 97-014-00, dated June 13, 1997.

Corrective Steps Taken and Results Achieved:

This information was contained in previously submitted LER 97-014-00, dated June 13, 1997.

Corrective Steps That Will Be Taken to Prevent Further Violations:

No further actions are required.

Date When Full Compliance Was Achieved:

Compliance was achieved on May 27, 1997 with the completion of revisions to surveillance test procedures MST-I0072 and MST-I0073 which corrected the technical aspects which caused the event.

Reported Violation C:

10 CFR 50, Appendix B, Criterion XVI requires that measures be established to assure that conditions adverse to quality such as deficiencies, deviations, and nonconformances are promptly identified and corrected. These requirements are further delineated in Section 12 of the licensee's corporate Quality Assurance Program Manual, Revision 18.

Contrary to the above, as of June 2, 1997, the licensee failed to take adequate corrective actions to resolve binding problems for the motor-driven auxiliary feedwater pump flow control valves following post-maintenance test failures.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

This information was contained in previously submitted LER 97-015-00, dated July 2, 1997.

Corrective Steps Taken and Results Achieved:

This information was contained in previously submitted LER 97-015-00, dated July 2, 1997.

Corrective Steps That Will Be Taken to Prevent Further Violations:

This information was contained in previously submitted LER 97-015-00, dated July 2, 1997.

Date When Full Compliance Was Achieved:

Compliance was achieved on June 3, 1997 when adjustments were made to the auxiliary feedwater pump flow control valves actuator spring pre-loading and subsequent testing was satisfactorily performed verifying the valves operability.

