

CATEGORY 1

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

SUBJECT: Forwards response to violations noted in insp rept
50-400/97-04. Corrective actions: during removal of missile
shield blocks on 970405, violation realized & plant entered
TS LCO 3.6.1.1 action statement.

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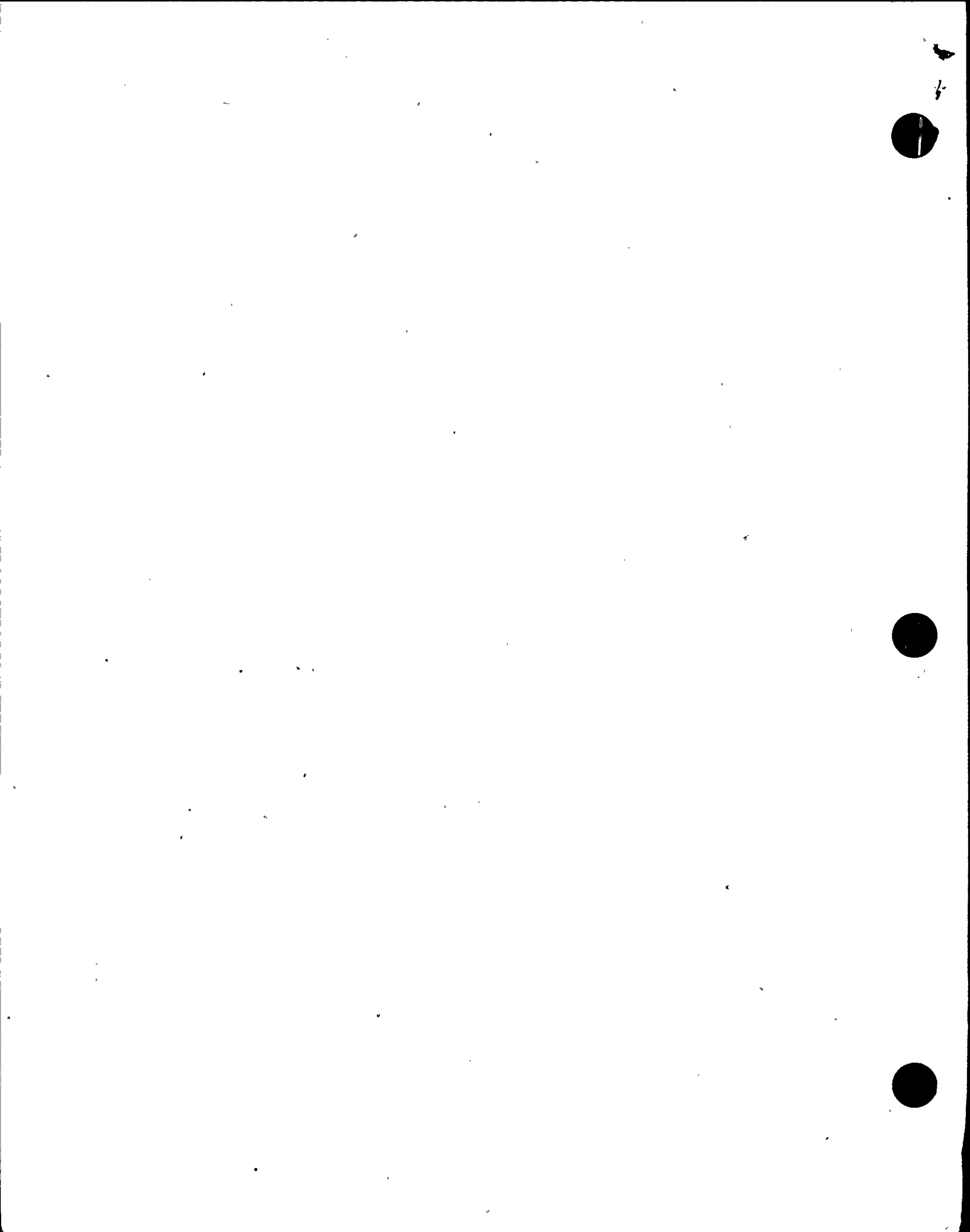
NOTES: Application for permit renewal filed. 05000400

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

William R. Robinson
Vice President
Harris Nuclear Plant

AUG 25 1997

SERIAL: HNP-97-162

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. 50-400/97-04)

Dear Sir or Madam:

Attached is Carolina Power & Light Company's reply to the Notice of Violation described in the enclosure of your letter dated August 5, 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)

1/1/97

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**REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/97-04**

Reported Violation :

Technical Specification (TS) 6.8.1 states that written procedures should be established and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Revision 2, Part 3.f, includes procedures for mode changes that affect primary containment.

Final Safety Analysis Report (FSAR) Section 3.5.2, Structures, Systems and Components to be Protected from Externally Generated Missiles, states that structures, whose failure could prevent safe shutdown of the reactor or result in significant uncontrolled release of radioactivity from the Unit, are protected against externally generated missiles. Figure 3.5.1-01, Safety Related Structures Systems and Components Protected Against Tornado Missiles, describes the containment removable equipment hatch missile shield as protection for the containment equipment hatch against design basis wind and tornado generated missiles.

Contrary to the above, on April 2, 1997, the licensee failed to maintain an adequate procedure for mode changes affecting containment in that the licensee approved Revision 6 to Procedure CM-M0100, Containment Equipment Hatch Removal and Replacement, which allowed the containment equipment hatch missile shield to be removed in Mode 3 (Hot Standby) and Mode 4 (Hot Shutdown). The fact that the procedure permitted the removal of the missile shield in these modes, without consideration of the actions described by TS 3.6.1.1, would have increased the probability of a significant, uncontrolled release of radioactivity from the Unit during accident situations involving design basis wind and tornado conditions.

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

Denial or Admission of Violation:

The violation is admitted.

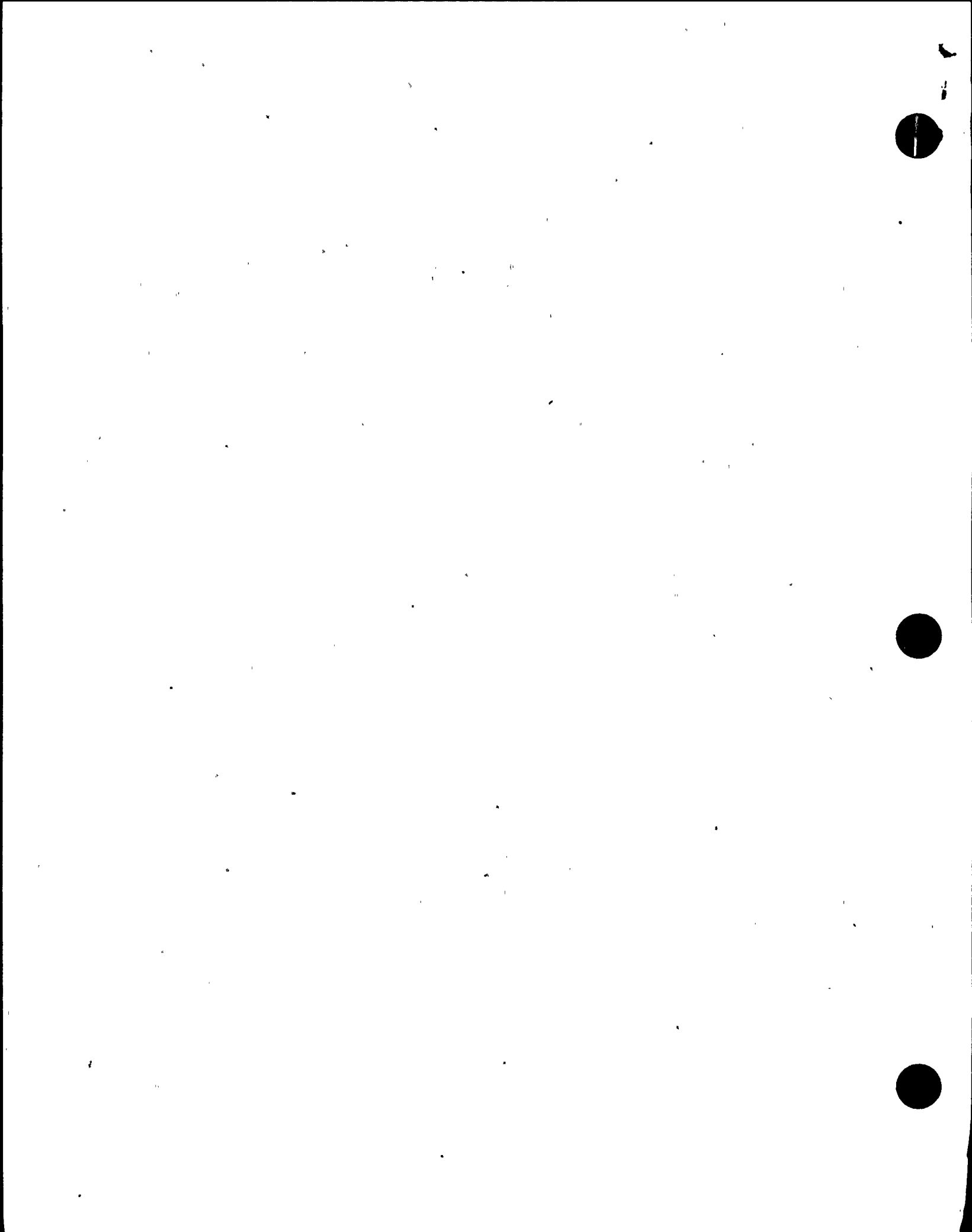
Reason for the Violation:

The violation occurred due to personnel error in that the formal procedure review process was not adhered to. The lack of specific information in the FSAR regarding the missile shield as it relates to containment operability is considered to be a contributing factor.

Corrective Steps Taken and Results Achieved:

During removal of the missile shield blocks on April 5, 1997, the violation was realized and the plant entered TS LCO 3.6.1.1 action statement. The missile shield blocks were reinstalled on April 6, 1997 within the time required by the action statement. Removal of the missile shield did not commence again until the plant entered Mode 5.

Procedure CM-M0100 was revised on May 20, 1997 to only allow containment equipment hatch missile shield block removal in Modes 5 and 6.



Corrective Steps Taken and Results Achieved: (continued)

This event has been reviewed with the Maintenance and Operations procedure writers and applicable Engineering personnel.

FSAR Sections 3.5.1, 3.5.2, and 3.8.1 have been revised to include information regarding missile protection afforded to the containment equipment hatch by the concrete missile shield blocks.

Lessons learned from this event have been included in Harris Plant's 10 CFR 50.59 initial training program.

Corrective Steps That Will Be Taken to Prevent Further Violations:

Removable missile shield blocks/plugs protecting safety-related or design basis type equipment will be identified and labeled by September 1, 1997.

Date When Full Compliance Was Achieved:

The containment equipment hatch missile shield blocks were reinstalled on April 6, 1997. The revision correcting Procedure CM-M0100 was approved May 20, 1997.

