CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC 970827 ltr re violations noted in insp rept 50-400/97-07.Corrective actions:entered unavailable time into MR Database,suspended use of flawed database & re-initiated previous method to account for clearance time.

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TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:Application for permit renewal filed. 05000400

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CATEGORY 1 DOCUMENT

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William R. Robinson
Vice President
Harris Nuclear Plant

SEP 1 8 1997

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Serial: HNP-97-179

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REPLY TO A NOTICE OF VIOLATION (NRC INSPECTION REPORT 50-400/97-07)

Dear Sir or Madam:

Attached is Carolina Power & Light Company's reply to the Notice of violation described in Enclosure 1 of your letter dated August 27, 1997.

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

Sincerely,

W R Robinson

IE01

MV.

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)

50029

REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/97-07

Reported Violation A:
10CFR50.65(a)(1) requires, in part, the holders of an operating license shall monitor the performance or condition of structures, systems, and components (SSCs), as defined in 10CFR50.65(b), against licensee-established goals in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions. When the performance or condition of a SSC does not meet established goals, appropriate corrective action shall be taken.

Contrary to 10CFR50.65(a)(1), as of July 21, 1997, the licensee failed to monitor the performance or condition of the Normal Service Water System against licensee-established goals effectively, in that the licensee did not adequately implement its monitoring program by failing to identify 15 hours and 44 minutes of unavailability for the B Normal Service Water Pump, which occurred on February 6, 1997. Monitoring unavailability is necessary in order to provide reasonable assurance that the Normal Service Water System remained capable of performing its intended function.

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

Denial or Admission:
The violation is admitted.

Reason for Violation:
The violation occurred due to a flaw in a recently initiated information report used to capture unavailability. Specifically, one source for identifying SSC unavailability is the Clearance Program database. Due to an oversight during its development, the electronic report used to query this database would not recognize data entries which did not contain either a "work order number" or "reason for clearance" in the data base. Due to the nature of work performed, this particular clearance did not require these fields to be completed, therefore the unavailability query did not contain the "B" NSW Pump clearance and no unavailability was entered into the Maintenance Rule (MR) Database for this SSC. The total unavailability for "B" NSW Pump during this event was 15 hours and 44 minutes.

Corrective Steps Taken and Results Achieved
The unavailable time was entered into the MR Database on July 22, 1997. The NSW System is currently in (a)(1) for events involving "B" NSW Pump. This additional unavailability will have no impact on current (a)(1) corrective actions and goals for the SSC.

On July 22, 1997, use of the flawed database query was suspended. A previous method to account for clearance time, one unaffected by the query flaw, was re-initiated. A review was also initiated to identify other occurrences of missed unavailability that occurred due to this inadequate query method. This review was completed on August 14, 1997. Two

Corrective Steps Taken and Results Achieved (continued)
additional examples were identified during this review and the applicable data was corrected.

Corrective Steps That Will Be Taken to Prevent Further Violation

The actions above resulted in full compliance. Suspending the use of the flawed database query method and re-initiating the use of an unaffected manual method will ensure accurate identification and tracking of SSC unavailability time.

Date When Full Compliance Achieved:
Full Compliance was achieved on July 22, 1997 when the unavailability time for the "B" Normal Service Water Pump was corrected.

Reported Violation B:
10CFR50.65(a)(1) requires, in part, the holders of an operating license shall monitor the performance or condition of structures, systems, and components (SSCs), as defined in 10CFR50.65(b), against licensee-established goals in a manner sufficient to provide reasonable assurance that such SSCs are capable of fulfilling their intended functions. When the performance or condition of a SSC does not meet established goals, appropriate corrective action shall be taken.

10CFR50.65(a)(2) requires, in part, that monitoring as specified in 10CFR50.65(a)(1) is not required where it has been demonstrated that the performance or condition of a SSC is being effectively controlled through the performance of appropriate preventive maintenance, such that the SSC remains capable of performing its intended function.

Contrary to 10CFR50.65(a)(2) the licensee elected to not monitor the performance or condition of certain SSCs against licensee-established goals pursuant to the requirements of section (a)(1) as evidenced by the following examples:

1. As of July 21, 1997, the licensee failed to demonstrate that the performance of the Steam Dump System, a system within the scope of 10CFR50.65, had been effectively controlled through the use of appropriate preventive maintenance. The licensee failed to establish adequate measures to evaluate the appropriateness of the performance of preventive maintenance on the Steam Dump System. Specifically, measures were not established to identify failure of the latching mechanism for the C7-A Loss of Load Interlock Relay, which occurred on March 31, 1997, as a functional failure for the Steam Dump System.

2. From March 20, 1997, to July 17, 1997, the licensee failed to demonstrate that the performance of the "C" Charging Safety Injection Pump, a component within the scope of 10CFR50.65, had been effectively controlled through the performance of appropriate preventive maintenance. For the "C" Charging Safety Injection Pump, the licensee established preventive maintenance measures that included unavailability to demonstrate

that the performance or condition of the pump was being effectively controlled such that it remained capable of performing its intended function. However, the licensee failed to implement the measures by not capturing approximately 10.75 days of unavailability (ending March 20, 1997) when the "C" Charging Safety Injection Pump was out of service. Failing to implement the preventive maintenance measures by not capturing 10.75 days of unavailability would require the pump to be placed under section (a)(1) for goals and monitoring.

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

Denial or Admission:

The violation is admitted.

Reason for the Violation:

Example One

This example resulted from a lack of adequate review of the relay failure regarding its potential impact on systems other than the system in which the relay is located. Specifically, review for SSC functional failures (FFs) is accomplished by a review of all work tickets associated with the assigned system. The work tickets are electronically transferred from a data warehouse to the specific system's database for the assigned system engineer's review. In this case the review was performed by the Reactor Protection System (RPS) engineer without consideration for the impact on other systems. As a result, while the failure was not a FF in the RPS, it was in the Steam Dump System. No performance criteria in the Steam Dump System was impacted by the additional FF.

Example Two

This example occurred as a result of inattention to detail during the transition of data to a new database configuration as part of an overall Maintenance Rule (MR) program upgrade. Specifically, unavailability data is electronically loaded in the MR Database under applicable "Performance Monitoring Groups" (PMGs) for a given system. Each PMG is used to monitor a specific portion (e.g. train, component, etc.) of the system. A recent effort to review/upgrade MR System scoping resulted in the revision to, and/or addition of, several system PMGs. Following the creation of the new/revised PMGs to a system's database, the event information, including unavailability time, was transferred from the old to the new PMG. The Chemical and Volume Control System (CVCS), which contains the "C" Charging Safety Injection Pump, was one of the later systems revised and involved a large number of changes. The error occurred during the transfer of data when the unavailability event for the "C" CSIP was not properly transferred to the new PMG.

Corrective Steps Taken and Results Achieved:

Example One
On July 23, 1997, the FF was entered in the appropriate PMG in the Steam Dump System. Additionally, a new feature has been added to the MR Database software that allows components' work ticket information to be loaded in more than one system. The information was added such that the Steam Dump System engineer can now review work ticket information for the relays in RPS that may have a functional impact on the Steam Dump System. This was completed on July 23, 1997. Actions are being taken to identify other System 1080 (RPS) relays that may have a functional impact on other systems and provide the same review capability for the other system engineers. In the interim, the RPS system engineer is responsible for contacting other system engineers if a failure he identifies could have a potential impact on a function in another system.

Example Two
The unavailability time for the "C" CSIP was entered into the proper PMG on July 22, 1997. A review of other systems was performed to identify other instances where the transition may have resulted in improperly transferring events. Additional examples were identified and corrected. In addition, a number of other unavailability events in the CVCS require further review to insure these are entered into the proper PMG.

Corrective Steps Taken to Prevent Further Violations:

Example One
All relays in RPS that have a potential impact on another system will be identified and will be loaded as critical components in those systems to permit review of work tickets by the affected system engineers. This will be completed by September 30, 1997.

Example Two
The unavailability events in question in the CVCS will be reviewed to insure that data is appropriately entered in the proper PMG. This will be completed by September 30, 1997.

Date When Full Compliance Will Be Achieved:

Example One
Full compliance was achieved on July 23, 1997 with entry of the FF into the Steam Dump System Database and the acceptance of the responsibility of the RPS system engineer to contact other system engineers regarding RPS relay failures that have a potential impact on functions of other systems.

Example Two
Full compliance will be achieved on September 30, 1997 with the completion of the action listed above (CVCS review).