

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina 05000400
AUTH.NAME AUTHOR AFFILIATION
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
50-400/97-09. Corrective actions: operations will perform
assessment to ensure, chart recorders being checked at least
once per shift as required by OMM-016.

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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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Carolina Power & Light Company
PO Box 165
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William R. Robinson
Vice President
Harris Nuclear Plant

NOV 5 1997

SERIAL: HNP-97-200

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. 50-400/97-09)

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 October 9, 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 VIOLATION
NRC INSPECTION REPORT NO. 50-400/97-09

Reported Violation:

Technical Specification 6.8.1.a requires written procedures to be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Item 1.a references procedures for operator log-keeping.

OMM-016, Operator Logs, Revision 13, Paragraph 5.1.b, Operations Shift Records states, in part, to check each operating recorder chart at least once per shift to assure that pens are marking properly and timing correctly. Mark each chart with the time the check is performed and initials.

Contrary to the above, on August 17, 1997, the licensee failed to assure, over two shift turnovers and one complete shift, that the component cooling water pressure (red pen) was properly marking the chart recorder as required.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

During the evening shift on August 16, 1997 the plant was reducing power for a condenser tube leak. The Reactor Auxiliary Building (RAB) Auxiliary Operator (AO) was annotating recorder charts in the Main Control Room (MCR). The charts being annotated were only those on the Recorder Panel impacted by the power reduction. The Balance of Plant Operator (BOP) recognized that the AO was annotating charts and assumed he was performing the timing and functional checks for all recorders. The BOP later in the shift recognized that the BOP Logs had not been initialed for all chart recorders. At this point the BOP remembered that the RAB AO had been annotating charts and asked if all recorders on the Recorder Panel and MCR back panels had been checked. The AO, thinking that the question was whether all the required charts had been annotated for the power reduction, responded in an informal manner that he had marked them all. This error in communications led to the chart recorders not being properly checked on August 16, 1997.

The failure to properly check and note the component cooling water (CCW) pressure chart recorder marking problems through two shift turnovers was due to an informal expectation for reviewing the Recorder Panel charts. In general, operations personnel have not always included the Recorder Panel as part of the turnover process. This is a poor practice, as the Recorder Panel includes important parameters and should be treated the same as the indications on the Main Control Board.



Corrective Steps Taken and Results Achieved:

Upon identification on August 17, 1997, the inking problem with the CCW pressure chart recorder was corrected and the chart was restarted.

The two operators involved in this inappropriate act have been counseled regarding the need for clear and concise communications. This incident was presented by the Manager of Operations to Operations individuals during Licensed Operator Requalification (LOR) Training Session 4 completed on October 2, 1997. The Manager of Operations has reinforced the expectation that recorders are a source of diverse, redundant indications of important plant information. A Night Order was issued on October 16, 1997 to specify the expectations for review of important plant parameters during Shift Turnover.

Corrective Steps That Will Be Taken to Prevent Further Violations:

Operations will perform an assessment to ensure that chart recorders are being checked at least once per shift as required by OMM-016. This assessment will be completed by December 1, 1997.

Data will be taken during the upcoming LOR Training cycle to verify that the reinforced expectation of reviewing recorders during shift turnovers has been effective. This action will be completed by December 1, 1997.

Date When Full Compliance Will Be Achieved:

Full compliance was achieved on August 17, 1997, when the CCW pressure chart recorder inking problem was corrected and the recorder was restarted.