

NOTICE OF VIOLATION

Carolina Power & Light Company
Shearon Harris Unit 1

Docket No. 50-400
License No. NPF-63

During an NRC inspection conducted from September 14 through October 25, 1997, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

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 references, in part, procedures for startup and operation, surveillance test procedures including the auxiliary feedwater system, abnormal operating and alarm procedures.

Contrary to the above, the licensee did not implement, and maintain procedures covering activities for plant startup, operation, alarm response, abnormal operation, and surveillance testing as evidenced by the following:

1. General Procedure (GP) 005, Power Operation (Mode 2 to Mode 1), Revision 18, section 5.0, step 102 provides instructions for placing the main feed regulating valves in service. Step 102.a requires the operator to verify main feed regulating valves are shut; Step 102.b requires the operator to open the feed regulating block valves; and Step 102.c requires the operator to open each main feed regulating valve as necessary to control steam generator level. This same sequence also is provided in Operating Procedure 134.01, Feedwater System, Revision 8, Section 5.4.

On August 31, 1997, the licensee failed to open the feed regulating block valves prior to opening the feed regulating valves.

2. General Procedure (GP) 005, Power Operation (Mode 2 to Mode 1), Revision 18, Section 5.0, step 131 indicates that a second main feedwater pump should be started prior to exceeding 300 psig turbine first stage pressure and after exceeding 6.0 and before 6.7 million pounds per hour total feed flow.

On September 1, 1997, the licensee failed to place a second main feedwater pump in service prior to 300 psig turbine first stage pressure resulting in a turbine runback.

3. From April, 1995 until September 26, 1997, the licensee failed to establish adequate procedures for when to start a second feedwater pump and when a turbine runback occurs with only one main feedwater pump operating, in that procedures GP-005, OP-134.01, AOP-010, and APP-ALB-020 conflict. These contradicting procedures contributed to turbine runbacks on March 4, 1996 and September 1, 1997 that occurred while placing a second main feedwater pump in service.

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4. Operating Surveillance Test Procedure 1080, Auxiliary Feedwater Pump 1X-SAB Full Flow Test Quarterly Interval, Revision 1, has sequential steps 37 and 38, which direct reestablishing the recirculation flow path in step 37 prior to securing auxiliary feedwater flow in step 38.

On August 30, 1997, the licensee failed to reinitiate turbine-driven auxiliary feedwater pump recirculation flow prior to securing auxiliary feedwater flow. This resulted in the turbine-driven auxiliary feedwater pump being deadheaded for five minutes.

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

Pursuant to the provisions of 10 CFR 2.201, Carolina Power and Light Company is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 20th day of November 1997