

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: Responds to NRC 971231 ltr re violations noted in insp rept
50-400/97-12. Corrective actions: temporary interim action
will remain in place until specific procedural requirements
are implemented.

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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

JAN 28 1998

SERIAL: HNP-98-013

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. 50-400/97-12)

Dear Sir or Madam:

Attached is Carolina Power & Light Company's (CP&L) reply to the Notice of Violation described in Enclosure 1 of your letter dated December 31, 1997.

Additionally, your cover letter discussed a concern that CP&L corporate procedures would allow this violation to occur in light of previously identified deficiencies. We are currently assessing the use and adequacy of corporate procedures and will inform you of the results of this effort.

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. S. C. Flanders (NRR Project Manager, HNP)
Mr. L. A. Reyes (NRC Regional Administrator, Region II)

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PDR ADOCK 05000400
Q PDR



**REPLY TO NOTICE OF VIOLATION
NRC INSPECTION REPORT NO. 50-400/97-12**

Reported Violation :

10 CFR 50 Appendix B, Criteria V, Instructions, Procedures, and Drawings, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Carolina Power and Light Corporate Quality Assurance Plan, Revision 18, Section 6.3, Procedures and Drawings, implements this requirement.

Nuclear Generation Group Standard Procedure EGR-NGGC-0005, Engineering Service Requests (ESR), Revision 6, section 9.11, step 9.11.2 provides instructions for ESR closeout and directs that ESR closeout should occur no later than 30 days after approval for non-modification ESRs and requires that design documents be revised consistent with the frequencies identified in procedure. Procedure EGR-NGGC-0007, Maintenance of Design Documents, Revision 2, section 9.6, step 9.6.3 requires that the Equipment Database System (EDBS) be considered as a Category A design document and therefore be updated prior to turnover or within 10 days of Document Update Notification of non-modification ESRs.

Procedure EGR-NGGC-0007, Maintenance of Design Documents, controls the document update process, and procedure EGR-NGGC-156, Environmental Qualification of Electrical Equipment Important to Safety provides instructions for establishing, maintaining, and implementing the Environmental Qualification (EQ) Program.

Contrary to the above, the licensee did not adequately develop, maintain, or implement procedures for controlling computer software development, plant configuration during the modification process, and for maintaining EQ Qualification Documentation Packages as evidenced by the following:

1. Prior to November 28, 1997, the licensee failed to have adequate instructions or procedures to ensure that software development activities could not affect quality related software and associated data files installed in the plant. This failure resulted in incorrect data being installed into the operating directory for the POWERTRAX system on August 15, 1997.
2. The document update process was inadequate during implementation of Engineering Service Request 9400116 when replacement hydrogen analyzer sample pump motor starters (ISP-E134:003 and ISP-E136:003) were installed in Hydrogen Analyzer panels in September 1997, and EDBS was not updated until December 2, 1997.



3. Prior to December 6, 1997, the licensee's procedures for the implementation of 10 CFR 50.49 associated with the environmental qualification of electrical equipment were inadequate in that they did not establish a clear time requirement for updating environmental qualification documentation packages to ensure that the packages are maintained current and auditable for installed plant equipment.

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

Denial or Admission of Violation:

The violation is admitted.

Reason for the Violation:

Example 1:

Incorrect data was installed into the operating directory for the POWERTRAX system on August 15, 1997 due to the Nuclear Fuels Management & Safety Analysis (NFM&SA) Unit's failure to require procedures which adequately controlled software development activities and would prevent these activities from affecting quality related software and associated data files installed in the plant.

Example 2:

The document update process was inadequate during the implementation of ESR 94-00116 due to a deficient ESR software programming routine. The ESR software routine, which is suppose to communicate with the Nuclear Revisions Control System (NRCS) when an ESR equivalency evaluated part change takes place in the plant, does not look at preventative maintenance (PM) work requests which was used to implement ESR 94-00116.

Example 3:

Procedures for the implementation of 10 CFR 50.49 did not contain a clear time requirement for updating the Environmental Qualification Data Packages (EQDP's) at Harris Nuclear Plant (HNP) due to CP&L's interpretation of the requirement that EQ files be maintained in an auditable form.

Corrective Steps Taken and Results Achieved:

Example 1:

As an interim action, instructions have been issued which direct that any NFM&SA changes (system configuration, data, or software applications) on either Harris Nuclear Plant or Robinson Nuclear Plant site computers shall be controlled by Engineering Service Request (ESR) products which contain explicit installation controls and testing. As an ESR product, the installation process will receive technical and safety reviews. This temporary, interim action will remain in place until specific procedural requirements are implemented.

Corrective Steps Taken and Results Achieved: (continued)

Additionally, system level "read only" access to the on-site POWERTRAX data files for the NFM&SA computer system have been implemented.

Example 2:

The category A documents affected by ESR 94-00116 were updated on December 3, 1997.

Example 3:

Based on the current interpretation of the requirement to maintain EQ files auditable, appropriate Engineering personnel have been instructed that EQDP's must have necessary revisions implemented within a specific time frame following ESR close out.

Corrective Steps That Will Be Taken to Prevent Further Violations:

Example 1:

Procedural controls for NFM&SA access to plant data and for NFM&SA computer system configuration/change control will be developed and implemented by April 3, 1998.

A review will be conducted of NFM&SA products and Guidelines against Corporate and Site requirements for Procedures to determine if further corrective actions are required. This review will be completed by February 27, 1998.

Example 2:

A correction will be made to the ESR software programming routine, which checks the parts used in ESR/EDBS/NRCS ties, to include PM work requests by April 30, 1998.

A review of PMs which have used parts and are associated with an ESR was performed to determine if there have been other ESR equivalency evaluations which have been implemented by PMs thus resulting in the same condition in which affected documents have not been updated. As a result of this review, four ESRs require additional evaluation to determine if affected documents require update as a result of the parts replaced by PMs. The four ESRs were reviewed for potential operability concerns and no concerns were identified. These evaluations and any affected document updates will be completed by February 23, 1998.

Example 3:

The approximately 51 EQDP's that currently have open ESR's posted against them and are approved for implementation will be updated to capture the outstanding changes by June 30, 1998.

Procedures EGR-NGGC-0156 and EGR-NGGC-0007 will be revised by February 27, 1998 to designate a specific time requirement for any future revisions of EQDP's following the completion of an ESR.



Date When Full Compliance Will be Achieved:

Full compliance will be achieved by June 30, 1998 upon completion of the corrective actions stated above.

