

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 January 18 through February 28, 1998, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- A. 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.h references procedures for log-keeping and item 9 references procedures for performing maintenance.
1. OMM-016, Operator Logs, Revision 14, Paragraph 5.1.2.b. Operations Shift Records requires, 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 initial.

Contrary to the above, from November 29, 1997, until December 6, 1997, the licensee failed to assure that the steam generator wide range level chart recorder, LR-477, was marking properly and timing correctly in that the chart was 12 hours off from true time. In addition, over two shift turnovers and one complete shift on November 30, 1997, the steam generator "B" wide range level green pen was not marking the chart recorder properly.

2. ADM-NGGC-0104, Work Management Process, Revision 3, Paragraph 9.8.7.9.d requires, in part, that the work instructions field shall contain a level of detail appropriate to the complexity of the task to be accomplished.

Contrary to the above, on February 24, 1998, the licensee failed to provide adequate work instructions for rod control system troubleshooting and repair in that the instructions failed to require that the rod control system counters be checked to ensure that they were properly aligned with actual rod position after it was determined that a multiplexer relay had failed. This resulted in the two control bank "D" groups of control rods being positioned out of sequence causing the two groups to be greater than one step apart.

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

- B. Technical Specification Surveillance Requirement 4.1.1.1.a requires, in part, that the shutdown margin shall be determined to be greater than or equal to 1770 pcm within 1 hour after detection of an inoperable

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control rod(s) and at least once per 12 hours thereafter while the rod(s) is inoperable.

Contrary to the above, on January 29, 1998, the licensee failed to determine that shutdown margin was greater than or equal to 1770 pcm within one hour after shutdown bank "C" rods were declared inoperable. The shutdown margin determination was completed one hour and nineteen minutes after the rods were declared inoperable.

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

- C. Technical Specification 6.8.1.h states that written procedures shall be established, implemented, and maintained covering the fire protection program implementation.

Operating License Condition 2.C.F states, in part, that Carolina Power and Light (CP&L) implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report (FSAR) for the facility.

FSAR sections 9.5.1.2 states that penetration seal designs are qualified by tests.

Penetration installation procedure CMP-010, "Installation of Penetration Seals," Revision 8, sections 6.0 and 7.0. states, in part, that the penetration seal installation work packages document acceptance criteria to ensure that the physical and chemical properties of the seals conform to the seal specifications and test reports.

Penetration installation procedure CMP-010, "Installation of Penetration Seals," Revision 8, section 7.0.12, states that Engineering shall specify size and location of subdividing partitions and material to be used on large floor/ceiling penetrations requiring subdividing as specified on typical detail drawings.

Penetration seal typical detail drawing 1364-93035, sheet 3, Revision 0, General Note No. 4 indicates that a penetration seal be subdivided by partitions if the maximum seal area limit is exceeded. The note also requires that the penetration engineers prepare sketches/drawings of the subdividing design and the materials (including structural support elements) installed and that this subdividing design documentation become a permanent part of the engineering documentation package of the seal.

Contrary to the above, the licensee did not adequately implement and maintain the applicable procedural requirements of the fire protection program as evidenced by the following:



1. Prior to February 6, 1998, the licensee failed to conduct qualification tests to demonstrate that the as-built penetration seal configurations of fire seals P 3308 and P 447A were adequate.
2. Prior to February 6, 1998, the licensee failed to implement penetration installation procedure CMP-010, in that Engineering failed to prepare sketches/drawings of a modification which subdivided a large electrical penetration fire seal number E 156.

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 Shearon Harris Nuclear Power Plant, 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 27th day of March 1998