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SUBJECT: Responds to NRC 980618 ltr re violations noted in insp rept 50-400/98-04. Corrective actions: tag for Equipment Clearance 98-00444 was properly hung for valve 1 MS-63.

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NOTES: Application for permit renewal filed.

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Carolina Power & Light Company Harris Nuclear Plant P.O. Box 165 New Hill NC 1998

SERIAL: HNP-98-093

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. 50-400/98-04)

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 June 18, 1998.

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

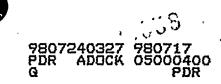
Sincerely,

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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REPLY TO NOTICE OF VIOLATION NRC INSPECTION REPORT NO. 50-400/98-04

Reported Violation :

Technical Specification 6.8.1.a requires, in part, that written procedures shall be established, implemented, and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes procedures for equipment control and clearances.

Procedure OPS-NGGC-1301, Equipment Clearance, Revision 2, requires that Tag Hangers position components and install clearance tags as required by the Clearance Tag Sheet. It also requires that Tag Verifiers ensure components are positioned and clearance tags hung as required by the Clearance Tag Sheet. Both the Tag Hanger and Tag Verifier are required to initial the Clearance Tag Sheet when the tasks are completed.

Contrary to the above, on May 6, 1998, Equipment Clearance 98-00444 was not properly executed in that the Tag Hanger and Tag Verifier indicated by initials on the Clearance Tag Sheet that valve 1MS-63 was properly clearance-tagged when the clearance tag had not been hung.

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

Denial or Admission of Violation: The violation is admitted.

Reason for the Violation:

The root cause for this procedure violation was inattention to detail. The Tag Hanger initialed the Clearance Tag Sheet without hanging the tag and the Tag Verifier initialed without verifying the tag was hung when the Clearance Tag Sheet clearly indicated a tag was required.

Corrective Steps Taken and Results Achieved:

The tag for Equipment Clearance 98-00444 was properly hung for valve 1MS-63. This occurred prior to the two involved individuals leaving the work area on May 6, 1998.

Both the Tag Hanger, a Senior Reactor Operator, and Tag Verifier, a Reactor Operator, were counseled by Operations management.

A site wide stand down was performed by HNP management on June 2, 1998 that used this event to stress the importance of the STAR (Stop, Think, Act Review) self checking technique and the need for a questioning attitude.

Corrective Steps That Will Be Taken to Avoid Further Violations:

A review of this event will be provided in the form of required reading to other appropriate Operations personnel reemphasizing the need for using STAR and demonstrating a questioning attitude and procedure adherence. This information will be provided by August 15, 1998.



Expectations for pre-job briefings will be reinforced. This will include discussion on the supervisor's responsibility to ensure that workers receive a task preview that covers the job scope, safety precautions, work environment and other items that could affect performance. This will be completed by August 31, 1998.

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Date When Full Compliance Was Achieved: Full compliance was achieved on May 6, 1998, when the clearance tag for Equipment Clearance 98-00444 was properly hung for valve 1MS-63.

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