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LANDIS,K.D. Region 2 (Post 820201)
RECIP.NAME RECIPIENT AFFILIATION
SCAROLA,J. Carolina Power & Light Co.

SUBJECT: Informs that NRC Region 2 will conduct triennial fire protection baseline insp 50-400/99-07 at Harris facility on 991101-05.Insp objection will be to evaluate fire protection program implementation.

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OCTOBER 7, 1999

Carolina Power & Light Company
ATTN: Mr. James Scarola
Vice President - Harris Plant
Shearon Harris Nuclear Power Plant
P. O. Box 165, Mail Code: Zone 1
New Hill, NC 27562-0165

SUBJECT: NOTIFICATION OF CONDUCT OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION (NRC INSPECTION REPORT NO. 50-400/99-07)

Dear Mr. Scarola:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region 2 staff will conduct a triennial fire protection baseline inspection at your Harris facility which is scheduled for November 1 - 5, 1999. The inspection will be conducted using Inspection Procedure 71111.05, the NRC's baseline fire protection inspection procedure, and will support the new pilot inspection oversight process.

The inspection objective will be to evaluate your fire protection program implementation with emphasis on post-fire safe shutdown capability and the fire protection features provided to ensure at least one post-fire safe shutdown success path is maintained free of fire damage. Based on the results of your IPEEE, higher core damage frequencies due to fire are incurred in plant fire areas, 12-A-CR/CRC1, 1-A-SWGR-A, 1-A-SWGR-B, and 1-A-BAL-B. The inspection team will focus their review of the separation of systems and equipment necessary to achieve and maintain safe shutdown and fire protection features of these fire areas.

On October 6, 1999, during a telephone conversation our respective staffs made the arrangements for a two day information gathering site visit which is scheduled for October 13 - 14, 1999. During this site visit we plan to discuss with your staff the inspection plan in more detail, to obtain information and documentation needed to support the inspection, to become familiar with the Harris fire protection program, fire protection features, post-fire safe shutdown capabilities and plant layout, and; as necessary, obtain plant specific site access training and badging for unescorted site access. A non-exhaustive list of the types of documents the team will be interested in reviewing, and possibly obtaining, are listed in Enclosure 1. Please do not copy in advance for the NRC inspectors all of the material in Enclosure 1. The inspectors will try to minimize your administrative burden by specifically identifying those documents required for inspection preparation.

During the information gathering visit, the team will also discuss the inspection support administrative details: office space location; specific documents requested to be made available to the team in their office spaces; and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the onsite inspection week you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Harris fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, appropriate personnel, knowledgeable with respect to those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the post-fire safe shutdown analyses), reactor plant fire protection systems, and the fire protection program and its implementation should be available at the site during the inspection.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Mr. K. Landis at (404) 562-4605, or Mr. G. Wiseman at (404) 562-4542.

Sincerely,

ORIGINAL SIGNED BY
KERRY LANDIS

Kerry D. Landis, Chief
Engineering Branch
Division of Reactor Safety

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

Enclosure: Supporting Documentation Requested for the
Reactor Fire Protection Program

cc w/encl: (See page 3)

cc w/encl:
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Regulatory Affairs CPB 9
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Director of Site Operations
Carolina Power & Light Company
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NRC Resident Inspector
U. S. Nuclear Regulatory Commission
5421 Shearon Harris Road
New Hill, NC 27562-9998

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SUPPORTING DOCUMENTATION REQUESTED FOR THE REACTOR FIRE PROTECTION PROGRAM

1. The current version of the Fire Protection Program and Fire Hazards Analysis.

2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade).

3. Fire brigade training program and pre-fire plans.

4. Post-fire safe shutdown systems and separation analysis.

5. Post-fire alternative shutdown analysis.

6. Piping and instrumentation (flow) diagrams highlighting the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.

7. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.

8. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.

9. Plant layout drawings which identify the general location of the post-fire emergency lighting units.

10. Associated circuit analysis performed to assure the shutdown functions and alternative shutdown capability are not prevented by hot shorts, shorts to ground, or open circuits (e.g., analysis of associated circuits for spurious equipment operations, common enclosure, common bus).

11. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room.

12. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.

13. Maintenance procedures which routinely verify fuse breaker coordination in accordance with the post-fire safe shutdown coordination analysis.

14. A sample of significant fire protection and post-fire safe shutdown related design change packages (including their associated 10 CFR 50.59 evaluations) and Generic Letter 86-10 evaluations.

15. The reactor plant's IPEEE, results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information.

16. Temporary modification procedures.

17. Organization charts of site personnel down to the level of fire protection staff personnel.

18. If applicable, layout/arrangement drawings of potential reactor coolant/recirculation pump lube oil system leakage points and associated lube oil collection systems.

19. The SERs and 50.59 reviews which form the licensing basis for the reactor plant's post-fire safe shutdown configuration.

20. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.

21. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.

22. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.

23. The three most recent fire protection QA audits and/or fire protection self-assessments.

24. Recent QA surveillances of fire protection activities.

25. Listing of open and closed fire protection condition reports (problem reports/NCRs/EARs/problem identification and resolution reports).

26. Listing of plant fire protection licensing basis documents.

27. NFPA code versions committed to (NFPA codes of record).

28. Listing of plant deviations from NFPA code commitments.

29. Listing of Generic Letter 86-10 evaluations.

99-06

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November 2, 1999

EA 99-270

Carolina Power & Light Company
ATTN: Mr. James Scarola
Vice President - Harris Plant
Shearon Harris Nuclear Power Plant
P. O. Box 165, Mail Code: Zone 1
New Hill, NC 27562-0165

SUBJECT: NRC INTEGRATED INSPECTION REPORT 50-400/99-06

Dear Mr. Scarola:

On October 9, 1999, the NRC completed an inspection at your Shearon Harris facility. The enclosed report presents the results of that inspection. The results of that inspection were discussed with you and other members of your staff on October 21, 1999.

The inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one violation of NRC requirements occurred. This violation is being treated as a Non-Cited Violation (NCV), consistent with Appendix F of the Enforcement Policy. This NCV is described in the subject inspection report. If you contest the NCV, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555-0001, with copies to the Regional Administrator, Region II; the NRC Resident Inspector at Shearon Harris Nuclear Power Plant; and the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room (PDR).

Sincerely,

(Original signed by B. Bonser)

Brian Bonser, Chief
Reactor Projects Branch 4
Division of Reactor Projects

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

Enclosure: Inspection Report

cc w\encl: (See page 3)

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REGION II

Docket No:	50-400
License No:	NPF-63
Report No:	50-400/99-06
Licensee:	Carolina Power & Light (CP&L)
Facility:	Shearon Harris Nuclear Power Plant, Unit 1
Location:	5413 Shearon Harris Road New Hill, NC 27562
Dates:	August 29 - October 9, 1999
Inspectors:	J. Brady, Senior Resident Inspector R. Hagar, Resident Inspector
Approved by:	B. Bonser, Chief, Projects Branch 4 Division of Reactor Projects

Enclosure

SUMMARY OF FINDINGS

Shearon Harris Nuclear Power Plant, Unit 1
NRC Inspection Report 50-400/99-06

The report covers a six-week period of resident inspection.

Inspection findings were assessed according to potential risk significance, and were assigned colors of GREEN, WHITE, YELLOW, or RED. GREEN findings are indicative of issues that, while not necessarily desirable, represent little risk to safety. WHITE findings would indicate issues with some increased risk to safety, and which may require additional NRC inspections. YELLOW findings would be indicative of more serious issues with higher potential risk to safe performance and would require the NRC to take additional actions. RED findings represent an unacceptable loss of margin to safety and would result in the NRC taking significant actions that could include ordering the plant shut down. Those findings that cannot be evaluated for a direct effect on safety with the Significance Determination Process, such as those findings that affect the NRC's ability to oversee licensees, are not assigned a color.

Cornerstone: Barrier Integrity

- GREEN. The licensee failed to take appropriate corrective action under 10 CFR 50.65 (a)(1) when a maintenance rule (a)(1) performance goal was exceeded for the Target Rock Position Indication performance monitoring group in system 9001, containment isolation valves. The established goal of no more than one failure in 18 months was exceeded on June 11, 1999, but was not recognized by the licensee, and appropriate corrective action was not taken until another functional failure occurred on August 17, 1999. This issue was characterized as a Non-Cited Violation and was determined to have low risk significance because failure of the Target Rock position indicators did not prevent operators from determining valve positions, and other more time-consuming methods were available. Second, the failure to recognize that a maintenance rule goal had been exceeded did not affect the ability of any valve to operate (Section 1R12).

Report Details

The unit was at essentially 100 percent power until September 9, when power was reduced to 86 percent due to problems with the steam generator preheater bypass valves. Power was returned to 100 percent on September 11 and remained at 100 percent for the remainder of the period.

1. REACTOR SAFETY
Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity

1R01 Adverse Weather Preparations

a. Inspection Scope

The inspectors reviewed the licensee's preparations for Hurricane Floyd on September 15, 1999.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R03 Emergent Work

a. Inspection Scope

The inspectors reviewed the following emergent items, as described in the referenced Work Request/Job Orders (WRJOs) and/or Action Requests (ARs):

Reference	Title/Description
WR/JO 99-AGUP1	Preheater bypass valve actuator air leaks
WR/JO 99-AGNX1	Boron totalizer replacement
AR 004097	Letdown pressure control valve (PCV 145) problems
AR 007914	SSPS relay problem during MST I0417

b. Observations and Findings

No findings were identified and documented through this inspection.

1R04 Equipment Alignment

a. Inspection Scope

The inspectors performed reviews of the motor-driven auxiliary feedwater system when the turbine-driven pump was inoperable for preventive maintenance, and the control room ventilation system during preventive maintenance.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R05 Fire Protection

a. Inspection Scope

The inspectors reviewed the condition reports (CRs), work orders, and impairments associated with the fire suppression system. The inspectors reviewed the status of surveillance activities to determine whether they were current to support the operability of the fire protection system. The inspectors observed a fire drill associated with a direct current (DC) battery charger in the B switchgear room.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R09 Inservice Testing (IST) of Pumps and Valves

a. Inspection Scope

The inspectors reviewed the performance of the following IST tests:

Number	Rev.	Title
OST 1051	7	"Reactor Auxiliary Building Emergency Exhaust System IST Quarterly" for damper 1AV-3
OST 1038	10	"Sampling, Chemical Addition, and Main Steam Drain ISI Valve Test"

b. Observations and Findings

No findings were identified and documented through this inspection.

1R11 Licensed Operator Requalification

a. Inspection Scope

The inspectors reviewed licensed operator requalification simulator examinations for operations crew C.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R12 Maintenance Rule Implementation

a. Inspection Scope

The inspectors reviewed the licensee's implementation of the Maintenance Rule (10 CFR 50.65) with respect to the equipment issues described in the following CRs and Engineering Service Request (ESR):

CR	99-02358	Target Rock containment isolation valve position indication
CR	99-01918	Containment isolation valve 1AF-157 stroke time problems
ESR	97-00547	Essential Services Chilled Water nonessential isolation valve

b. Observations and Findings

The inspectors found that significant CR 99-02358 described two failures of Target Rock valve position indicators under system 9001, containment isolation valves (CIV). The description stated that the goals set forth in CR 97-03489 for the Target Rock Position Indication performance monitoring group (PMG) under system 9001 had been exceeded. The goal was for no more than one functional failure due to reed switch failure during an 18-month period starting at the completion of refueling outage (RFO)8 on December 2, 1998. Some 20 valves which were not CIVs were added to the PMG which included CIVs because the a(1) corrective actions had included a modification to upgrade the position indicators.

The inspectors reviewed the maintenance rule database to confirm the status of the Target Rock PMG in system 9001. The inspectors confirmed that the PMG was in a(1) status, that CR-97-03489-1 established the goals for the a(1) to a(2) transition, and that the goal was no more than one failure in the 18-month period between RFO8 and RFO9. The inspectors reviewed the maintenance rule event log and found that functional failures under the Target Rock Position Indication PMG had occurred on January 18, 1999 (CR 99-00164); June 11, 1999 (CR 99-00699); and August 17, 1999 (CR 99-02358). Only the last one identified that the goal had been broken. None of these functional failures involved a failure of the valves to perform their containment isolation function. The inspectors questioned why the occurrence on June 11 (CR 99-00699) had not been considered as the functional failure that caused the goal to be exceeded.

The licensee reviewed the associated information and initiated significant AR 00008315, Failure to Recognize Exceeding a Maintenance Rule a(1) Goal, as a result of their review. The AR identified that procedures ADM-NGGC-0101, Maintenance Rule Program, and CAP-NGGC-0001, Corrective Action Management, require that when an a(1) goal is exceeded, a "significant adverse" CR is to be initiated for the purpose of evaluating the need for additional corrective action.

10 CFR 50.65 a(1), Maintenance Rule, requires that when the performance or condition of a structure, system, or component does not meet established goals, appropriate corrective action shall be undertaken. As stated above, the licensee failed to recognize that the established goal of no more than one failure in 18 months was exceeded on

June 11, 1999, and therefore did not take appropriate corrective action based on that until another functional failure occurred on August 17, 1999. This is considered a violation of 10 CFR 50.65 a(1) for not taking appropriate corrective action when a Maintenance Rule goal was not met. This violation is being treated as a Non-Cited Violation, consistent with Appendix F of the NRC Enforcement Policy. This violation is in the licensee's corrective action program as AR 00008315. The inspectors have designated this violation NCV 50-400/99-06-01, Failure to Recognize That an a(1) Goal Was Exceeded.

This issue had relatively low ("green") risk significance, for two reasons:

- First, failure of the Target Rock position indicators did not prevent operators from determining valve positions, because other, more time-consuming methods were available.

- Second, the failure to recognize that a maintenance rule goal had been exceeded did not affect the ability of any valve to operate.

1R13 Maintenance Work Prioritization & Control

a. Inspection Scope

The inspectors reviewed the licensee's assessments of the risk impacts of removing from service those components associated with the emergent work items listed in Section 1R03.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R14 Nonroutine Plant Evolutions

a. Inspection Scope

The inspectors reviewed the operating crew's performance during the following non-routine evolutions:

- Unexpected shutting of all three steam generator preheater bypass valves on September 9 and associated power reduction to 86%.

- The planned shutting of the preheater bypass valves at 100% power on September 17.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R15 Operability Evaluations

a. Inspection Scope

The inspectors reviewed the operability evaluations described in the following ESRs:

ESR 99-00114 R0	P-4 Operability Determination
ESR 99-00142 R0	Essential Services Chilled Water Operability Evaluation for Shut Non-Nuclear-Safety Isolation Valves

b. Observations and Findings

No findings were identified and documented through this inspection.

1R16 Operator Work-Arounds

a. Inspection Scope

The inspectors reviewed an operator work-around associated with the essential service chilled water non-essential isolation valves.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R19 Post Maintenance Testing

a. Inspection Scope

The inspectors reviewed the following post-maintenance tests:

Test Procedure		
Number	Title	Related maintenance task
OST-1077	"Auxiliary Feedwater Valves Operability Test Quarterly Interval Mode 4-5-6"	Steam generator preheater bypass valve air pump leak repair
OST-1085	"1A-SA Diesel Generator Operability Test"	Diesel generator preventive maintenance
EPT-33	"Emergency Safeguards Sequencer System Test"	Sequencer relay calibration.

b. Observations and Findings

No findings were identified and documented through this inspection.

1R22 Surveillance Testing

a. Inspection Scope

The inspectors reviewed the following surveillance tests:

Number	Rev.	Title
MST-I0027	7	"Steam generator B Narrow Range Level (L-0485)Calibration - ATWS portion"
FPT-3004	9	"Main Fire Pump Flow Test, Annual Interval"

b. Observations and Findings

No findings were identified and documented through this inspection.

4. OTHER ACTIVITIES

4OA4 Other

(Closed) LER 50-400/98-004-00 and 01: Design deficiency related to inadequate runout protection for the Turbine Driven AFW Pump. This LER did not involve a violation of regulatory requirements and was closed.

4OA5 Management Meetings

1. Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management on October 21, 1999. The licensee acknowledged the findings presented.

The inspectors asked the licensee whether any of the material examined during the inspection should be considered proprietary. No proprietary information was identified.

PARTIAL LIST OF PERSONS CONTACTED

NRC

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R. Laufer, Harris Project Manager, NRR

Licensee

D. Alexander, Regulatory Affairs Manager
C. Burton, Director of Site Operations
B. Clark, Harris Plant General Manager
J. Cook, Outage Manager
R. Field, Nuclear Assessment Manager
T. Hobbs, Acting Operations Manager
J. Holt, Outage and Scheduling Manager
M. Keef, Training Manager
G. Kline, Harris Engineering Support Services Manager
J. Scarola, Harris Plant Vice President
B. Waldrep, Maintenance Manager
E. Wills, Environmental & Radiation Control Manager

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

50-400/99-06-01	NCV	Failure to recognize that an a(1) goal was exceeded (Section 1R12)

Closed

50-400/99-06-01	NCV	Failure to recognize that an a(1) goal was exceeded (Section 1R12)
50-400/98-004-00	LER	Design deficiency related to inadequate runout protection for the Turbine Driven AFW Pump. (Section 4OA4)
50-400/98-004-01	LER	Design Deficiency related to inadequate runout protection for the Turbine Driven AFW Pump. (Section 4OA4)