CP&L
Carolina Power & Light Company

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HARRIS NUCLEAR PROJECT
P. O. Box 165
New Hill, North Carolina 27562

OCT 1 1 1985

File Number: SHF/10-13510 NRC-392
Letter Number: HO-850217 (O)

Dr. J. Nelson Grace
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)

Dear Dr. Grace:

In reference to your letter of September 11, 1985 and Inspection Report RII: MDH 50-400/85-32, the attached is Carolina Power and Light Company's reply to the violation identified in the inspection report.

It is considered that the corrective action taken/planned is satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Yours very truly,

J. L. Willis
Plant General Manager
Shearon Harris Nuclear Power Plant

DLT/jsb

Attachment

cc: Messrs. B. C. Buckley (NRC)
G. Maxwell (NRC-SHNPP)

IE01

Attachment to CP&L Letter of Response to NRC Report RII: MDH 50-400/85-32-01

Reported Violation:

10 CFR 50.54(a)(1) requires the licensee to implement the quality assurance program described or referenced in its Safety Analysis Report. Section 17.2.14 states that measures are established for indicating the operating status of structures, systems and components.

Contrary to the above, the heaters for charging/safety injection pump 1B motor were found deenergized but the heater disconnect switch was not tagged and the heaters for charging/safety injecting pump 1C motor were found inoperative but not identified as such.

This is a Severity Level V violation (Supplement II).

Denial or Admission and Reason for the Violation:

The violation is correct as stated. The Quality Assurance requirements referenced in the violation require that the subject electric motors be stored in a condition that does not degrade the motors. While the motors were located in the plant, but not operational the long-term storage requirements for these motors were satisfied, in part, with the installation of temporary heaters or temporary power to the heaters installed within the motors. These heaters provided assurance that moisture would not condense within the motors. These temporary controls were checked on a daily basis and were supplemented with semiannual checks on the motor. These activities were governed by procedures WP-106, "Maintenance/Protection of Permanent Plant Equipment" and PM-E-0025, "Electrical Preventive Maintenance for 6.9 KV Motors".

Temporary heaters or temporary power to permanent heaters were removed from the motors when the permanent power was wired to a motor and pre-operational checkouts and testing began on the motor. At this point control of the motors shifted to the Start-up Unit with the applicable Start-up Engineers responsible for directing the operation and testing of the motor including any other applicable surveillances for the motor. Since the permanent environmental controls in the power block were not operational, steps should have been taken to assure that the permanent heaters were in operation whenever practicable. This was not done on a systematic basis and led to the condition noted in the violation.

Corrective Steps Taken and Results Achieved

The motor heater circuit breakers for the Charging/Safety Injection Pumps as well as heaters for other safety related motors as described below have been added to the Auxiliary Operators Log and are being checked daily.

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Corrective Steps Taken to Avoid Further Noncompliance:

The following steps have been taken to prevent recurrence:

1. A Review was performed on turned over RFT's as of September 1, 1985 and a list of motor heaters with permanent plant power connected was provided to Operations personnel. Motor heater circuit breakers for 6.9 KV and 480V AC safety related motors were identified and added to the Auxiliary Operators Log and are being checked daily.

2. A training class was held on August 21, 1985 for Start-Up personnel stressing the importance of minimizing the time period motor heaters are de-energized (the period of time when temporary power is disconnected and permanent power is connected) and the need to provide to Operations personnel a list of breakers that supply permanent power to motor heaters as they are turned over from Construction.

3. Start-Up Manual, Volume I is being revised to reflect the Start-Up engineers responsibility to coordinate the connection of the permanent power source to the heaters, energize and test the power source, minimize the time period that the heater is de-energized during this transition and to notify the Shift Foreman that heaters are in service.

Several additional points should be noted. First, interruptions in the heater power are inevitable because construction, testing or preventative maintenance activities may require that a power supply or bus be deenergized; however, it is anticipated that such outages will not be prolonged. Second, checks of the power supply breakers do not provide assurance against the burnout of a heater; heater continuity will be checked as described above on a semiannual basis during pre-operational testing and on a reduced frequency following fuel load. Third, the corrective actions stated above are only required until HVAC is declared operational by the Manager of Operations and motors are evaluated to determine that heaters are not essential for ensuring the motors are free of condensation.

Date When Full Compliance Will Be Achieved:

Full compliance is pending the revision of Start-Up Manual, Volume I to incorporate the responsibilities of the Start-Up Engineer in regards to motor heaters. It is currently projected that full compliance will be achieved by October 15, 1985.