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CP&L

Carolina Power & Light Company

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SHEARON HARRIS NUCLEAR PROJECT
P. O. Box 101
New Hill, North Carolina 27562

FEB 27 1986

File Number: SHF/10-13510E
Letter Number: HO-860239 (O)

NRC-420

Dr. J. Nelson Grace
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Northwest (Suite 2900)
Atlanta, Georgia 30323

Dear Dr. Grace:

In reference to your letter of January 14, 1986, referring to RII: PAT 50-400/85-47-04, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

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

Thank you for your consideration in this matter.

Yours very truly,



R. A. Watson
Vice President
Shearon Harris Nuclear Power Plant

RAW:cwj

Attachment

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

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Reported Violation:

10 CFR 50, Appendix B, Criterion V as implemented by CP&L accepted QA program (FSAR Chapter 17.2) requires that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. 10 CFR 50, Appendix B, Criterion XVII as implemented by CP&L accepted QA program (FSAR Chapter 17.2) requires that test records shall as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to these requirements, test procedure 1-2005-P-01, Revision 0, Hot Functional Test, approved December 11, 1985, provided acceptance criteria 7.1 and 7.2, which are vague and imprecise as follows:

7.1 Reactor Coolant System heat-up has been satisfactorily demonstrated within limitations listed or referenced in the steps of this procedure (Section 6.1).

7.2 Supporting Systems and Components have demonstrated satisfactory operation as described in the steps of this procedure.

Furthermore, as of December 20, 1985, the procedure steps and data sheets listed below did not prescribe quantitative, or qualitative acceptance criteria, normal operating ranges or limitations to evaluate the test results and the acceptability of the test data.

10.2	Reactor Coolant Pump Data
10.4	Incore Cooling (ICC) Monitor
10.5	#1 Seal Data w/RCP's Secured
10.8	#1 Seal Data w/RCP's Energized
10.9	Containment Ventilation
10.18	CRDM Cooling Fan Temperature

In addition, the following sets of data do not have a verification signature and date to identify the data recorder for data sheets: 10.2, 10.4, 10.9, 10.10, 10.11, 10.12, 10.13, 10.14, 10.16, 10.18, 10.19, 10.20, 10.21, 10.22, and 10.23.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. In the first part of the violation the acceptance criteria of the procedure in Section 7.1 and 7.2 of 2005-P-01 was vague in that it referenced steps in the procedure in general and should have been worded in a more precise manner. The Data Sheets listed recorded data without either providing definitive acceptance criteria or indicating that the data was for baseline data only and not required to meet any testing requirement or commitments.

The second part of the violation was due to CP&L's misinterpretation of the requirements for having a "data recorded by" signature or initials on each Data Sheet within a pre-operational test procedure. CP&L's interpretation had been that when data was recorded on a data sheet at the direction of a procedural step within the body of the procedure which had an initial/date blank (____/____), that another signature on the data sheet was not required.

Corrective Steps Taken and Results Achieved:

Test procedure 1-2005-P-01 was revised to correct the concern as noted. Data sheets were revised to include signature blocks and the acceptance criteria was included on each applicable data sheet. Those data sheets that were used for recording base line data were so annotated on the data sheets.

Corrective Steps Taken to Avoid Further Noncompliance:

A memorandum was issued to Start Up personnel requiring that data taken have definitive acceptance criteria or that the data be identified as baseline data only if there is no intention or requirement to determine acceptable performance as a part of the test. The memorandum required a review of approved procedures. Procedures not yet approved will be corrected prior to approval.

Data sheet signature requirements have been reiterated to Start-up personnel. An independent review of pre-operational tests that had been or were in the process of being conducted, was performed to ensure that pre-operational tests had signature lines on the data sheets and complied with the signature and data acceptance criteria. Procedures not yet approved will be corrected prior to approval.

For completed test procedures without initial or signature blanks on data sheets, the test report will be used to identify personnel recording data and memo's to file written, reviewed by the joint test group, and filed with the completed procedure. For completed test procedures without definitive acceptance criteria a memo to file will be written, reviewed by the joint test group, and filed with the completed procedure evaluating the acceptability of the test results.

Date When Full Compliance was Achieved:

Full compliance is pending completion of "Corrective Steps Taken to Avoid Further Noncompliance" as stated above. It is projected that full compliance will be achieved by April 1, 1986.

