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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

MAR 26 1986

File Number: SHF/10-13510E
Letter Number: HO-860245 (O)

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

NRC-432

Dear Dr. Grace:

In reference to your letter of March 4, 1986, referring to RII:
PAT 50-400/86-04, the attached is Carolina Power & Light Company's
reply to the deviation identified in Enclosure 1.

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

Thank you for your consideration in this matter.

Yours very truly,

J. L. Willis by direction
J. L. Willis
Plant General Manager
Harris Nuclear Project

RAW:jes

Attachment

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

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Attachment to CP&L Letter of Response to NRC Report RII:
PAT 50-400/86-04

Reported Deviation:

FSAR Chapter 14.2, test summary 14.2.12.1.34, Auxiliary Feedwater System Test, test objective a.4 states: To demonstrate steam turbine auxiliary feedwater pump (AFWP) startup from cold conditions and measure steam pressure operating range. Acceptance Criteria d.3 states: The turbine driven auxiliary feedwater pump reliability shall be demonstrated by performance of five consecutive cold starts.

Contrary to these commitments, test procedure 1-3065-P-02, Revision 1, Auxiliary Feedwater System Test which was in progress during the inspection did not provide sufficient time between (AFWP) starts to allow cooldown so that subsequent (AFWP) starts are from cold conditions. The test procedure also lacked steps to measure steam pressure operating range and specified four consecutive cold starts in lieu of five.

Corrective Action Taken:

In regard to the concern that test procedure 1-3065-P-02, Rev.1 did not provide sufficient time between (AFWP) starts to allow cooldown so that subsequent (AFWP) starts were from cold conditions, the following action was taken. Test Change Notice (TCN) #7 to procedure 1-3065-P-02, Rev. 1, sect 6.2 was issued which established cold start criteria to be when the bearing metal temperatures decrease below 100°F as read on the computer. Data sheets were added by the TCN to record the starting and operating conditions of the pump.

In regard to the concern that test procedure 1-3065-P-02, Rev.1 also lacked steps to measure steam pressure operating range and specified four consecutive cold starts in lieu of five, the following action was taken. Procedure 1-3065-P-02 Rev.1, sect. 6.2 addressed five starts of the pump. The fifth start was shown in conjunction with opening the turbine trip and throttle valve against differential pressure. TCN#7 was issued to clarify the fifth cold start as stated above. TCN#7 also incorporated specific data (including steam pressure) to be taken before each Turbine Driven AFW pump start and while the pump is running.

Corrective Action Taken to Prevent Further Deviations:

Memorandums were issued to appropriate Start-up personnel and members of the Joint Test Group stressing the importance of ensuring regulatory commitments are carefully reviewed and incorporated into appropriate procedures.

Date When Corrective Actions Were Completed:

The above actions were completed on March 20, 1986

