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SUBJECT: Responds to NRC 880622 ltr re violations noted in Insp Rept 50-400/88-11.

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JUL 20 1988

File Number: SHF/10-13510E
Letter Number: HO-880139 (O) NRC-633

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United States Nuclear Regulatory Commission
Washington, DC 20555

SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400
LICENSE NO. NPF-63
REPLY TO A NOTICE OF VIOLATION

Gentlemen:

In reference to your letter of June 22, 1988, referring to I.E. Report RII: 50-400/88-11, the attached is Carolina Power & Light Company's reply to the violation identified in Enclosure 1.

The violation transmittal letter requested additional discussion on the implementation of the configuration control program. As pointed out in the attached response, we believe that the violation was caused by the failure to recognize the impact of the solid state protection system test on the ability of plant safety systems to perform their intended safety function. Personnel that allowed the test to be performed were licensed operators and trained to recognize, the operability of safety systems.

We do not believe that the procedures which govern the control of operating systems need to be revised beyond that described in the response and that the specific training provided to license operators is sufficient to address the generic implications of this violation.

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

Thank you for your consideration in this matter.

Very truly yours,

R. A. Watson

R. A. Watson
Vice President
Harris Nuclear Project

MGW:lem

Attachment

cc: Messrs. B. C. Buckley (NRC)
G. Maxwell (NRC-SHNPP)
Dr. J. Nelson Grace (NRC)

Attachment to CP&L Letter of Response to I. E. Report RII: 50-400/88-11 Violation

Reported Violation:

Technical Specification 6.8.1a requires that written procedures be implemented covering the procedures outlined in Appendix A of Regulatory Guide 1.33, Rev. 2, February 1978. Administrative Procedures are identified in Appendix A of the Regulatory Guide.

Administrative Procedure AP-006, Rev. 7, Section 5.7, titled "Procedure Review and Approval", requires procedures to provide sufficient guidance to maintain control of plant safety systems to assure that the systems will perform their intended functions.

Contrary to the above, Operations Management Manual Procedures OMM-003, Equipment Inoperable Record, and OMM-001, Conduct of Operations, and Operations Work Procedure OWP RP-17, Reactor Protection Automatic Trip Logic, did not ensure control of plant safety systems during testing of the solid state protection system. Specifically, on April 19, 1988, and August 18, 1987, the licensee unknowingly placed the unit under the requirements of Technical Specification (TS) 3.0.3 by allowing testing of "A" train solid state protection system to proceed, even though some of the plant safety equipment in the "B" train was not operable. Consequently, the plant continued operating at full power (Mode 1), rather than beginning a power reduction within the one hour time limit that TS 3.0.3 requires.

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

Denial or Admission and Reason for The Violation:

The violation is correct as stated.

On April 19, 1988, at 1310, the plant was operating in Mode 1 at 100% power. Train "A" of the Solid State Protection System (SSPS) was placed in test for routine, required surveillance from 1310 until 1426. The plant Technical Specifications allow an SSPS channel to be in test for up to two hours if the other channel is operable, however, several components of the "B" train had been previously declared inoperable at various times during the day for preventive maintenance and testing. The "B" train components which had been declared inoperable included the "B" Motor Driven Auxiliary Feed Water (AFW) Pump, the "B" Emergency Service Water (ESW) Pump, the "B" Control Room Emergency Filtration unit, and the "B" Reactor Auxiliary Building (RAB) Emergency Exhaust.

The conflict between the "B" train inoperable equipment and the "A" train SSPS test was not recognized by operations personnel at the time, consequently, Technical Specification 3.0.3 applied for 1 hour and 16 minutes while the train "A" SSPS was in test. This situation was discovered on April 22, 1988, during review of Equipment Inoperable Records (EIRs).

This event was caused by an error made by the Operations personnel in the Clearance Center and the Main Control Room, coupled with a situation which was not adequately covered by Technical Specifications or applicable operations procedures. Neither the plant Technical Specifications nor the operating procedures explicitly addressed mechanical equipment associated with instrument channels. Each of the EIRs were done at a different time, and the interrelationship was not noticed by the preparers or reviewers. The oversight was identified during a subsequent review of a group of EIRs.

Corrective Steps Taken and Results Achieved:

A thorough review was conducted of EIRs that were in effect during performance of monthly SSPS tests during the previous 12 months. It was discovered that a similar event occurred on August 18, 1987. At that time, Train "A" of the SSPS was placed in test for 1 hour and 25 minutes while the "B" ESW Screen Wash Pump and the RAB Exhaust Damper (D-61) were inoperable.

Corrective Steps Taken to Avoid Further Noncompliance:

1. Relevant operating procedures have been revised to highlight the need to consider the operability of equipment on the other train when performing testing of the solid state protection system.

2. The "Operator Prerequisite Summary Sheet" in the SSPS Actuation Logic and Master Relay tests will be revised to remind operators that opposite train equipment must be evaluated before permitting these tests to be run (MSTI-0001 and MSTI-0320).

3. Training on this event has been provided to active licensed personnel.

Date When Full Compliance Was Achieved:

Full compliance will be achieved upon revision to the "Operator Prerequisite Summary Sheet" as stated above. Projected completion date is August 1, 1988.