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SUBJECT: Responds to NRC 900131 ltr re violations noted in Insp Rept
 50-400/89-34.

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R. B. RICHEY
Manager
Harris Nuclear Project

MAR 2 1990

Letter Number: HO-900041 (0)

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United States Nuclear Regulatory Commission
Washington, DC 20555

NRC-701

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 January 31, 1990, referring to I.E. Report RII: 50-400/89-34, the attached is Carolina Power and Light Company's reply to violation "A" 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.

Very truly yours,



R. B. Richey, Manager
Harris Nuclear Project

MGW:dgr

Enclosure

cc: Mr. R. A. Becker (NRC)
Mr. S. D. Ebnetter (NRC - RII)
Mr. J. E. Tedrow (NRC - SHNPP)

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ATTACHMENT TO CP&L LETTER OF RESPONSE TO
NRC I.E. REPORT RII: 50-400/89-34, VIOLATION "A"

Reported Violation:

Technical Specification 6.8.1.a requires that written procedures be established and implemented covering procedures outlined in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

Regulatory Guide 1.33, Appendix A, paragraph 8.b requires that written procedures be provided for surveillance tests.

Operations Surveillance Test OST-1804, Residual Heat Removal (RHR) Remote Position Indication and Timing Test, provides the steps and prerequisites necessary to verify proper valve operation. Step 3.1 of this procedure requires that the system being tested be aligned in a manner that will support the performance of the test.

Operations Surveillance Test OST-1004, Power Range Heat Balance, provides the steps necessary to adjust the power range nuclear instruments. Note 1 on attachment VII of this procedure, requires that if there is insufficient adjustment of the fine gain potentiometer, that a work request be generated to adjust the course gain potentiometer.

Contrary to the above,

1. On November 28, 1989, procedure OST-1804 was not properly implemented in that the RHR system lineup was not adequately aligned to allow test performance which resulted in the overflow of contaminated borated water from the reactor vessel to the seal table area of containment.
2. On December 23, 1989, procedure OST-1004 was not properly implemented in that a work request was not generated and course gain adjustments were made.

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

Denial or Admission:

The violation is admitted. Example 1 and 2 of the violation are addressed separately, each with a specific reason for the violation, corrective steps taken, corrective steps taken to prevent further violations and full compliance date given.

1. Reason For The Violation:

On November 22, 1989, Sections 7.1 and 7.3 of OST-1804 (RHR Remote Position Indication and Timing Test, Eighteen (18) Month Interval, Modes 5 and 6) were successfully completed for the B train. (The vessel was defueled and both trains of RHR were secured.) On November 28, 1989, refueling was complete and B train RHR was in operation. OST-1804 was to



be performed on the "A" train valves. The Shift Technical Advisor (STA) was running the test. The STA conducted a briefing on the test with the Reactor Operator (RO), who would operate the valves and the Auxiliary Operator (AO), who would verify valve position locally. The briefing included the purpose and general methods used to accomplish the test.

The "A" RHR train had two valves in series (RH-1 and RH-2) that isolate RHR from the Reactor Coolant System. When the testing began, RH-2 was open and under clearance for maintenance. RH-1 was also open, but capable of being closed. With RH-2 under clearance, Section 7.1 (RHR Valve Timing Test) could not be performed. The STA therefore skipped Section 7.1 and proceeded to 7.2 (Remote Position Indication Verification, Train "A"). He did not realize that Section 7.1 ensured that RH-1 and RH-2 were closed prior to starting Section 7.2. Section 7.2 requires cycling the Refueling Water Storage Tank (RWST) to RHR pump suction valve. If this is done with RH-1 and RH-2 open, the RWST will gravity drain to the reactor vessel. Section 7.2 did not contain a specific caution addressing gravity drain, because this could not occur if RH-1 or RH-2 was shut (as would be the case if Section 7.1 had been performed).

The RO was responsible for all operations involving the primary side of the plant. He was tasked with monitoring primary system operations, outage activities affecting his indications, and log taking. When the STA requested him to stroke SI-322, RWST suction to a RHR pump, he also failed to detect that this would establish a gravity drain flow path via the open loop suction valves.

When requested, the RO opened SI-322. The valve took approximately 20 seconds to open and was open for approximately 20 seconds while the AO verified its position. Then it was stroked shut. After taking the valve switch to shut, the RO noticed his Reactor Vessel Level Instrumentation System (RVLIS) trend on a CRT screen increasing. About one minute after cycling the valve, the Control Room got a call from the Containment refueling level HP Technician. He reported water was coming out from around the vessel head flange. The vessel head was in place, but the bolts were not yet torqued down, which allowed reactor coolant to leak through the gap between the head and vessel flanges. Vessel level increased from 19-3/4" below the flange to approximately 18" above the flange. Water spilled through the gap at the flange into the refueling cavity and the seal table room (previously not contaminated). RWST level decreased by approximately 1 percent which corresponds to approximately 3,000 gallons.

Corrective Steps Taken and Results Achieved:

Valve SI-322 was closed and the gravity drain path was isolated.

Corrective Steps Taken to Avoid Further Violations:

Procedure OST-1804 is being revised to include a caution relative to gravity drain prior to cycling RWST suction valves. A review of other OSTs that cycle RWST suction valves is being performed and revision to include cautions where applicable will be made.



This event will be reviewed with appropriate Operations personnel. The review will emphasize that when skipping steps/sections in a procedure, it must be ensured that the existing system lineup is consistent with what it would have been if the skipped step/section had been performed.

Date Full Compliance Will Be Achieved:

OST-1804 will be revised and other OSTs will be reviewed and revised, as appropriate, by December 31, 1990.

A review of this event with appropriate Operations personnel will be completed by March 31, 1990.

2. Reason For The Violation:

On December 23, 1989, a calorimetric calibration was completed for the nuclear instruments (NIs). The power range NIs were found to be reading lower than actual core power, as determined by the calorimetric. The calorimetric indicated actual power at approximately 41 percent while the power range NI indicated approximately 28 percent. The shift foreman on duty directed an I&C Technician to adjust the course gain on the instruments. Procedure MMM-012, Maintenance Work Control Procedure Section 5.4 Priority/Emergency Maintenance, allows the Shift Foreman to direct maintenance activities without preplanning and without a Work Request in an emergency or abnormal operating conditions. The Shift Foreman considered the difference between the actual and indicated power to be an abnormal operating condition and therefore directed the adjustments be made. MMM-012 Section 5.4 also requires that if maintenance activities are directed as stated above those actions shall be documented after the fact and receive the same degree of review as if they had been preplanned. The Shift Foreman failed to initiate the required documentation at this time. This resulted in no Work Request initiation until January 9, 1990.

Corrective Steps Taken and Results Achieved:

A Work Request and Authorization (90-AAMY1) was initiated on January 9, 1990.

Corrective Steps Taken to Avoid Further Violations:

Shift Foreman and Senior Reactor Operators are being required to review the applicable sections for MMM-012, to ensure an understanding of these requirements.

Date Full Compliance Will Be Achieved:

The above stated reviews will be completed by March 9, 1990.

