

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina      05000400  
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 RICHEY, R.B.      Carolina Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Responds to NRC 910724 ltr re violations noted in insp rept  
 50-400/91-14. Corrective actions: Operations, maintenance &  
 engineering personnel made aware of importance of GFFD Sys  
 to Emergency Plan.

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NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

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R. B. RICHEY  
Vice President  
Harris Nuclear Project

AUG 23 1991

Letter Number: HO-910113 (O)

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United States Nuclear Regulatory Commission  
Washington, DC 20555

NRC-761

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 July 24, 1991, referring to I.E. Report RII: 50-400/91-14, the attached is Carolina Power and Light Company's reply to the violation 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.

Very truly yours,



R. B. Richey,  
Vice President  
Harris Nuclear Project

MGW:kjc

Attachment

cc: Mr. S. D. Ebnetter (NRC - RII)  
Ms. B. L. Mozafari (NRC)  
Mr. J. E. Tedrow (NRC - SHNPP)

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Attachment to CP&L Letter of Response to NRC I. E. Report RII: 50-400/91-14  
Violation

Reported Violation:

10 CFR 50.54(q) states that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect an Emergency Plan which meets the standards in 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50. 10 CFR 50.47(b)(8) states that the Emergency Plan must meet the following standard: "Adequate emergency facilities and equipment to support the emergency response are provided and maintained."

Section 3.1 of the Shearon Harris Emergency Plan states: adequate emergency facilities, communication, and equipment to support emergency response are provided and maintained. Section 3.2.3h of the Emergency Plan identifies the Gross Failed Fuel Detector as a piece of Control Room equipment to be maintained.

Contrary to the above, the Gross Failed Fuel Detector was not adequately maintained and has been out of service since August 7, 1989, as indicated by work request 89ANMM1. The Gross Failed Fuel Detector could not provide data essential to emergency classification decision making.

This is Severity Level IV violation (Supplement VIII).

Denial or Admission and Reason for the Violation:

The violation is admitted.

It is acknowledged that the Gross Failed Fuel Detection (GFFD) System which is a system referenced by the Shearon Harris Emergency Plan, was not adequately maintained from August 7, 1989, to July 10, 1991.

The GFFD System contains design elements which are unique to the Harris Plant and have been very difficult to maintain since initial installation. The system as originally installed was unable to maintain proper sample flow. After repeated attempts to rework the flow control valve had failed to provide a long term fix, a modification request was initiated to have the flow control redesigned. Since,

1. The GFFD System has no operability requirements contained within the Technical Specifications and is not required for the safe shutdown of the plant, and,
2. Other indications of fuel failure such as reactor coolant sampling, area radiation monitors and containment high range accident radiation monitors had been considered to be adequate alternative indications for emergency action level purposes,

an inappropriate emphasis was placed on the modification and repair work. Plant personnel were not fully aware of all applicable regulatory commitments for the GFFD System. Consequently, the repairs were not completed in a timely manner.

Corrective Steps Taken and Results Achieved:

When the violation was identified, immediate steps were taken to implement a modification to the GFFD System and return the system to service. The GFFD System became fully operational on July 22, 1991, upon the satisfactory completion of Maintenance Performance Testing MPT-I0013.

Corrective Steps Taken to Prevent Further Violations:

1. Operations, maintenance, and engineering personnel have been made aware of the importance of the GFFD System to the Emergency Plan.
2. System engineers will be made aware of Emergency Plan equipment requirements. A list of Emergency Plan equipment broken down by system will be provided as a reference to ensure that required equipment is properly maintained.

Date When Full Compliance Will Be Achieved:

The GFFD System was fully operational on July 22, 1991. The remaining corrective actions will be completed by October 23, 1991.

