



Carolina Power & Light Company

Harris Nuclear Plant
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APR 25 1996

U.S. Nuclear Regulatory Commission
ATTN: NRC Document Control Desk
Washington, DC 20555

Serial: HNP-96-074
10CFR50.73

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1
DOCKET NO. 50-400
LICENSE NO. NPF-63
LICENSEE EVENT REPORT 96-002-04

Gentlemen:

In accordance with Title 10 to the Code of Federal Regulations, the enclosed revision to Licensee Event Report 96-002 is submitted. This revision reports additional Technical Specification Testing deficiencies identified during the on-going Technical Specification testing program review.

Sincerely,

J. W. Donahue
General Manager
Harris Plant

MV

Enclosure

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LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (IT 6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Harris Nuclear Plant Unit-1

DOCKET NUMBER (2)

50-400

PAGE (3)

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TITLE (4)

Failure to properly perform Technical Specification surveillance testing.

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
3	26	96	96	002	04	4	25	96		05000
									FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more) (11)							
POWER LEVEL (10)		0%	20.2201(b)			20.2203(a)(2)(v)			X 50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(i)	50.73(a)(2)(x)
			20.2203(a)(2)(i)			20.2203(a)(3)(ii)			50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)			20.2203(a)(4)			50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)			50.36(c)(1)			50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)			50.36(c)(2)			50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On January 17, 1996, during a Technical Specification testing program review, a failure to perform required surveillance testing during a planned maintenance outage in October, 1994 was identified. Specifically, on October 30, 1994, the plant was shut down and taken to Mode-5 (Cold Shutdown). This outage exceeded 72 hours and per Technical Specification requirements Engineered Safety Feature slave relay testing was required. To satisfy this requirement OST-1083 and OST-1084 were satisfactorily completed, however the slave relay circuits for the CSIP Alternate Mini-Flow Isolation Valves, 1CS-746 and 1CS-752 were not tested due to an error that occurred during a procedure revision in June 1993.

In September 1992, a plant modification was completed on the Charging/Safety Injection Pump (CSIP) Alternate Mini-Flow System that necessitated revisions to Operations Surveillance Test procedures OST-1083 and OST-1084. These revisions were completed in June 1993 and removed the slave relay testing for CSIP Alternate Mini-Flow Isolation Valves (1CS-746 and 1CS-752) from OST-1083 and OST-1084 and transferred the testing requirement to procedure OST-1809. The cause of the Technical Specification violation was personnel error during the June 1993 procedure revision process for OST-1083 and OST-1084. OST-1809 was successfully performed during Refueling Outage 6 on September 8, 1995. This test verified the operability of these circuits, thus no immediate corrective action was required upon identification of the deficiency. Additional corrective actions included personnel counseling, appropriate procedure revisions and the continuation of an in-progress Technical Specification testing program review.

One additional Technical Specification testing deficiency (item #11) was identified during the on-going comprehensive Technical Specification testing program review and is being reported by this supplemental report.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT DESCRIPTION:

On January 17, 1996, a failure to perform Technical Specification surveillance testing during an October 1994 planned maintenance outage was identified. The identification of this condition was a result of an on-going comprehensive Technical Specification testing program review that began in September 1995 following submittal of LER 95-07.

Specifically, on October 30, 1994, the plant was shut down and taken to Mode-5 (Cold Shutdown) for a planned maintenance outage. This outage exceeded 72 hours and therefore, per Technical Specification 4.3.2.1 requirements, Engineered Safety Feature (ESF) slave relay testing was required for the 13 ESF relays delineated in Table 4.3-2 that had not been tested in the last 92 days due to being at full power operations. To satisfy this requirement OST-1083 and OST-1084 were completed on November 3, 1994. However, the slave relay circuits for the CSIP Alternate Mini-Flow Isolation Valves (1CS-746 and 1CS-752, EIIS Code BQ-ISV) were not tested due to an error that occurred during procedure revisions performed in June 1993 on Engineered Safety Feature (ESF) 18-Month Slave Relay Operations Surveillance Test procedures OST-1083 and OST-1084. This error involved inappropriately removing the slave relay testing for the 1CS-746 and 1CS-752 circuits from OST-1083 and OST-1084 and transferring the testing requirement to procedure OST-1809 (Refueling Water Storage Tank switchover to the Containment sumps), which is also an 18-month ESF response time test. OST-1809 was not performed following the October maintenance outage, thus resulting in the testing omission and Technical Specification violation.

During the investigation of this event, personnel performing the Technical Specification testing program review verified that OST-1809 had been successfully performed during Refueling Outage 6 on September 8, 1995, which verified the operability of the affected circuits.

The June 1993 revisions to OST-1083 and OST-1084 were performed to incorporate a plant modification (PCR-6547) on the Charging/Safety Injection Pump (CSIP) Alternate Mini-Flow lines. This modification removed the previously installed relief valves and provided an "open" signal to 1CS-746 and 1CS-752 upon receipt of a Safety Injection signal.

This condition was determined to be a violation of the Technical Specification surveillance test periodicity requirement and is being reported per 10CFR50.73(a)(2)(i)(b).

The following additional Technical Specification testing deficiencies have been identified by the on-going comprehensive Technical Specification testing program review:

1. Slave relays (K635 & K640) for the Auxiliary Feedwater (AFW) Flow Control Valves (EIIS BA-FCV) were not tested within their required quarterly surveillance interval following Refueling Outage (RFO) 5 in 1994 through RFO 6 in October 1995. This was a result of inadequate technical reviews associated with the plant modification (PCR-6502) that installed the auto-open signal to these valves. PCR-6502 specified the slave relay surveillance testing interval as once per 18 months per Technical Specification 4.7.1.2, but failed to identify the quarterly requirement contained in Technical Specification 4.3.2.1. Both of these relays were subsequently tested following RFO 6, which verified their operability. This condition was identified on February 1, 1996.
2. Testing for manual Safety Injection (SI, EIIS-BQ) and Containment Spray (CS, EIIS-BE) actuation has not fully tested all switch contacts within the required 18 month surveillance test interval per Technical Specification 4.3.2.1. The Operations Surveillance Test Procedures (OST-1825 & OST-1826) that verify the operability of the actuation circuits, only test one of the two manual actuation switches for each signal once per 18 months, thus resulting in the Technical Specification violation. The alternate test switch has been satisfactorily tested approximately once per 36 months due to test performance staggering. Based on this previous testing, the SI and CS switches are currently operable. However, one set of CS switches will become inoperable on March 3, 1996 and one SI switch will become inoperable on March 19, 1996. This condition has existed since initial development of OST-1825 & OST-1826 and was identified on February 12, 1996.

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3. Quarterly surveillance testing was not performed for the "B" Charging/Safety Injection Pump Mini-Flow Isolation Valve (1CS-196) Slave Relay (K601) (EIS Code BQ-ISV,RLY) during Refueling Outage 6 in 1995. This slave relay should have been tested during the performance of OST-1086 in August of 1995, but the "B" CSIP was inoperable and 1CS-196 was under clearance at the time of the test. This was noted in the procedure, but the test was considered satisfactory by the operations control room staff due to a deficiency in the acceptance criteria section of OST-1086. The acceptance criteria, which was changed during a recent procedure revision, did not specify the need to test the 1CS-196 slave relay, so no Equipment Inoperable Record was generated for tracking purposes, which would have required subsequent testing. The operability of the slave relay was successfully verified by performing OST-1086 in December 1995. This condition was identified on February 17, 1996.
4. Eleven Maintenance Surveillance Test (MST) Procedures were identified that did not verify automatic isolation of the effluent pathway on a loss of power for the associated radiation monitor (EIS Code IL-MON) as required by Technical Specification 4.3.3.10. This affected six radiation monitors and their related pathways. This testing omission was created when the MSTs were inappropriately revised in 1993 in an effort to eliminate procedure steps that were thought to be redundant and unnecessary. Inattention to detail and an incomplete understanding of the Technical Specification testing requirements for the radiation monitor circuitry caused the deficiency. The testing requirements for these radiation monitors were removed from Technical Specifications in May 1995, but due to the time frame of the deficiency, the condition constitutes a violation and is therefore included in this LER supplement. This condition was identified on February 14, 1996.
5. Proper overlap testing has not been performed for an actuation of the Fuel Handling Building Emergency Ventilation System (EIS-VG) originating from a high radiation alarm signal, as per Technical Specification 4.9.12. OST-1048 tests this feature, but does not include a particular section of cable (#I2913M-SA) between the North Spent Fuel Pool Radiation Monitor (RM-1FR-3567A-SA, EIS Code IL-MON) and the South Spent Fuel Pool Radiation Monitor (RM-1FR-3564A-SA). This condition has existed since initial development of OST-1048 and was identified on February 19, 1996. Technical Specification compliance is satisfied by the current operability of other FHB radiation monitors.
6. Logic testing for the Control Room Emergency Filtration Fans (R-2 "A" and "B", EIS Code VI-FAN) has inadequately verified all automatic fan start signals associated with a Control Room Isolation Actuation. OST-1825 and 1826 have properly verified that the fans automatically start upon receipt of a safety injection actuation signal, however, the operability of a parallel circuit path that provides an automatic start signal on high radiation has not been verified during past testing. This condition has existed since initial development of the applicable surveillance procedures and constitutes a violation of Technical Specification 4.3.2.1 surveillance requirements. This condition was identified on February 22, 1996.
7. Logic testing for the Reactor Auxiliary Building Electrical Equipment Protection Room Inlet Isolation Valves (1CZ-7 & 1CZ-8, EIS Code VF-V) has not properly verified the operability of each actuation circuit path. These valves receive a thermal overload bypass signal from two parallel sources; a Control Room Ventilation Isolation Signal and a signal from the Emergency Safeguards Sequencer. Surveillance testing has properly verified the operability these circuits from the Emergency Safeguards Sequencer. However, a portion of the thermal overload bypass circuit for Control Room Isolation has not been verified when the signal is generated from high radiation. This constitutes a violation of Technical Specification 4.3.2.1 surveillance requirements. This condition has existed since initial surveillance procedure development and was identified on February 26, 1996.
8. Trip Actuating Device Operational Testing has not been adequately performed for the Main Feedwater Pump trip signal following a safety injection actuation. OST-1825 actuates the safety injection switch and then verifies that the Main Feedwater Pumps trip, but due to the process involved during this testing, which includes lifting several leads and installing jumpers in Auxiliary Relay Panel (ARP-10, EIS Code SJ-PL), a section of internal wiring in ARP-10 has not been verified. This testing deficiency has existed since initial surveillance procedure development and constitutes a violation of Technical Specification 4.3.2.1 surveillance requirements. This condition was identified on March 4, 1996.

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9. Ten Maintenance Surveillance Test Procedures were identified that did not perform a channel out of service alarm test or control room annunciation verification on the effluent channels of four separate radiation monitors (EIS Code IL) as required by Technical Specification 4.3.3.11, Table 4.3-9. This condition has existed since initial development of the applicable surveillance test procedures and was identified on March 11, 1996.
10. Surveillance testing has not been performed to properly verify the operability of fourteen blocking relays in the Emergency Safeguards Sequencer (ESS) Panels. (EIS Code EK-PL,RLY) These relays function to ensure that ESF components start from the sequencer's load block properly by blocking normal process demand signals and by preventing non-essential safety loads from energizing during load blocks 1 through 8. This testing deficiency has existed since initial surveillance procedure development and constitutes a violation of Technical Specification surveillance requirement 4.8.1.1.2. This condition was identified on March 21, 1996 and at 1500 hours, both Emergency Sequencers were declared inoperable. Due to this, Technical Specification 4.0.3 was entered, which allowed 24 hours to demonstrate operability of the sequencers. Special surveillance test procedures (OST-9018T and OST-9019T) were developed to perform this testing. At 1500 hours on the next day, March 22, 1996, testing to demonstrate sequencer operability was not complete, so the plant entered Technical Specification 3.0.3, which required shutdown to Mode-3 by 2200 hours. At 1804, the plant commenced a load decrease to comply with this requirement. At 2139, the plant was taken off line and at 2152, Mode-3 was achieved. Testing was completed to verify proper operation of the A-train sequencer at 2336 on March 22, 1996 and for the B-train sequencer at 1430 on March 23, 1996.
11. Surveillance testing has not been performed to verify proper operation of the Containment Fan Cooler Post-Accident Dampers (CV-D1, CV-D3, CV-D5, CV-D7 / EIS Code VA-DMP). These dampers receive an open signal from the Emergency Safeguards Sequencer and directly from the associated fan cooler starting circuitry. Previous surveillance testing did not verify operability of the signal circuitry originating from the sequencer, failed to consider the existence of a parallel path within the start signal circuitry from the four fan cooler units and did not properly verify that the dampers were actually open. This condition was identified on March 26, 1996, at which time the plant was shutdown in Mode-5 (Cold Shutdown). This constitutes a violation of Technical Specification surveillance requirement 4.6.2.3. To verify operability of these dampers, testing was developed and performed on March 27, 1996. This testing identified that two of the post-accident dampers did not fully open as required and returned closed. Following lubrication of one damper and a minor modification to increase the output of the other damper actuator, satisfactory results were obtained and the dampers and their associated fan cooler units were returned to service on March 28, 1996.

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CAUSE:

The cause of the original Technical Specification violation was personnel error during the June 1993 procedure revision process for OST-1083 and OST-1084. The testing requirements for the slave relay circuits for the CSIP Alternate Mini-Flow Isolation Valves (1CS-746 and 1CS-752) were inappropriately transferred to OST-1809, which was not identified or scheduled as a Mode-5 "event related" surveillance test.

Cause For Additional Items Identified:

Item 1:

The failure to adequately test the K635 and K640 slave relays for the AFW Flow Control Valves was caused by inadequate technical reviews associated with plant modification PCR-6502. This resulted in deficient surveillance test procedures developed to verify the operability of the automatic open signal for the flow control valves on a quarterly basis.

Items 2, 3, 4, 5:

Each of these items were caused by inadequate surveillance test procedures that resulted from incorrectly interpreting how to implement Technical Specification testing requirements. The test procedures for the Safety Injection and Containment Spray manual actuation switches, as well as the FHB Emergency Ventilation system, were based upon this incorrect interpretation and have been deficient since initial development. The radiation monitor MST revisions completed in 1993, were intentionally performed to eliminate what was considered to be redundant and unnecessary testing steps. This decision was also based on the incorrect testing requirement interpretation, as was the revision to OST-1086 that resulted in the acceptance criteria section not listing 1CS-196, and subsequently resulting in the failure to test the valve.

Items 6, 7, 8, 9, 10, 11:

Each of the additional items contained in the revisions to this LER were identified as a result of the on-going Technical Specification testing program review and were caused by inadequate surveillance test procedures. In the case of item #11, the two post-accident dampers failed to fully open during testing due to improper actuator sizing and inadequate lubrication and preventive maintenance methods.

SAFETY SIGNIFICANCE:

There were no adverse safety consequences as a result of this event. The CSIP Alternate Mini-Flow Isolation Valve circuits were tested satisfactorily on September 8, 1995 to verify operability. This testing provides confidence that had an accident occurred requiring CSIP mini-flow protection due to the re-pressurization of the Reactor Coolant System during a safety injection, the isolation valves would have opened to prevent pump damage.

There were no adverse safety consequences as a result of the additional items contained in previous revisions to this LER. In each case where applicable, subsequent testing was performed that verified the operability of the effected component or circuit. In the case of item #11, where two of the Containment Fan Cooler Post-Accident Dampers failed to completely open during testing, consequences are still under investigation and will be provided in the next supplement to this report. These dampers are required to be open in a post-accident condition within containment to allow a high velocity fan discharge flow to selected areas of containment to accelerate temperature mixing and heat removal. Assuming the failure of these two dampers to open during an accident scenario, combined with the postulated worst case single failure of one safety related electrical supply bus, preliminary engineering review has determined that adequate air flow would still exist to ensure containment cooling. This is based on the availability of one train of Containment Spray and the fact that one fan would remain operable in each Containment Fan Cooler unit. The discharge air flow from each fan would not exit through the post-accident dampers, but would still provide air mixing in containment via the seismic class 1 concrete air shafts.

PREVIOUS SIMILAR EVENTS:

Previous events have been submitted as LERs related to surveillance testing deficiencies caused by procedural inadequacies. LER 95-07, which was submitted on September 28, 1995, contained a corrective action to perform a comprehensive Technical Specification testing program review and it was during this review process that the CSIP Alternate Mini-Flow Isolation Valve condition was identified. This review is being performed by a multi-discipline team and is still in progress.

The additional items reported in this supplement were identified as a result of the on-going Technical Specification testing program review.

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CORRECTIVE ACTIONS COMPLETED:

1. Slave relay testing was satisfactorily completed on September 8, 1995 that verified the operability of the CSIP Alternate Mini-Flow Isolation Valve circuits.
2. Personnel involved in the June 1993 procedure revision process for OST-1083 and OST-1084 were counseled.
3. Surveillance procedures OST-1083 and OST-1084 were revised on February 16, 1996 to include the requirements for CSIP Alternate Mini-Flow Isolation Valve slave relay testing.

CORRECTIVE ACTIONS PLANNED:

1. The comprehensive Technical Specification testing program review that identified this condition is currently in progress and will be completed as described in LER 95-07.

CORRECTIVE ACTIONS FOR ADDITIONAL ITEMS IDENTIFIED:

Item #1

OST-1044 was revised in December 1995 and OST-1045 was revised in February 1996. These revisions incorporated K635 and K640 slave relay testing on a quarterly basis.

Item 2:

To address the SI switch that would have become inoperable on March 16, 1996, a Request for Exigent License Amendment was submitted to the NRC on February 16, 1996. This requested a one-time extension of the testing interval for testing the SI switch, due to the hazards involved with testing while on-line. Operations Surveillance Test procedure (OST-9016T) was revised and performed to test the CS switches. Additionally, a new OST will be developed to properly test each Safety Injection and Containment Spray manual actuation switch once every 18 months. This action will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

Item 3:

OST-1086 will be revised to enhance the acceptance criteria to ensure that testing of the "B" CSIP Normal Mini-Flow Isolation (ICS-196) is included. This action will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

Item 4:

The radiation monitor operability and testing requirements were moved from Technical Specification 4.3.3.10 to the Off-Site Dose Calculation Manual (ODCM) in May 1995. Upon identification of this condition, the effected radiation monitors were declared inoperable. Appropriate MST procedure revisions were completed and the tests performed, to fully verify the automatic pathway isolation function of the radiation monitors. Additional procedure changes and/or ODCM revisions will be completed to clarify the testing requirements and enhance the performance of future testing. These actions will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

Item 5:

OST-1048 will be revised to test the FHB Train A Emergency Ventilation actuation from Radiation Monitor RM-1FR-3567A-SA, which will properly include the previously omitted cable. This revision will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

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Item 6:

MST-I0359 and MST-I0361 were revised on February 21, 1996 and successfully performed. This verified the operability of the parallel R-2 fan start circuit on high radiation.

Item 7:

OST-9017T was developed and successfully performed on February 27, 1996. This verified the operability of the thermal overload bypass circuit used during the Control Room Isolation Signal when generated from high radiation. Future testing of this circuit will be incorporated with a revision to the appropriate maintenance surveillance test procedures or a newly developed operations surveillance test procedure. This will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

Item 8:

OST-1825 and OST-1826 will be revised to properly test appropriate internal wiring in ARP-10. This revision will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

Item 9:

Immediate corrective actions included declaring the affected radiation monitors inoperable and placing the deficient MST procedures on administrative hold until they could be revised. These procedures were subsequently revised and performed as needed to properly demonstrate the operability of the radiation monitors. This was completed on March 14, 1996.

Item 10:

Immediate corrective actions for this item included declaring both Emergency Safeguards Sequencers inoperable and complying with the testing and plant shutdown requirements of Technical Specification 4.0.3 and 3.0.3. Testing was completed to verify operability of the A-train sequencer at 2336 on March 22, 1996 (OST-9018T) and for the B-train sequencer at 1430 on March 23, 1996 (OST-9019T).

Item 11:

Following corrective maintenance, which included a modification to increase the actuator spring rate for damper 1CV-D1, testing was satisfactorily performed on March 28, 1996 and the post accident dampers and their associated fan cooler units were returned to service. Preventive maintenance for these dampers was enhanced by generating a checklist (CL-ME0023) that includes requirements for periodic lubrication and inspection. This was completed on 4/19/96. The appropriate surveillance test procedures will be revised to include future testing of the post-accident dampers. These revisions will be completed as addressed in the Harris Plant response to NRC Generic Letter 96-01.

EIIS CODES:

High Head Safety Injection: BQ
 Auxiliary Feedwater Flow Control Valves: BA-FCV
 Containment Spray: BE
 Containment Ventilation: VA
 Fuel Handling Building Ventilation: VG
 Control Room Emergency Ventilation: VI
 Reactor Auxiliary Building Ventilation: VF
 Main Feedwater: SJ
 Radiation Monitoring: IL
 Emergency Sequencers: EK