

# CP&L

Carolina Power & Light Company

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HARRIS NUCLEAR PROJECT  
P.O. Box 165  
New Hill, North Carolina 27562

MAR 24 1986

File Number: SHF/10-13510E  
Letter Number: MS-862027 (O)

NRC-433

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

Dear Dr. Grace:

In a telephone conversation of March 6, 1986, your personnel requested clarification of Carolina Power & Light Company's reply to the violation identified in Enclosure 1 of your letter dated January 28, 1986, referring to RII: PAT 50-400/85-47-04. CP&L's original response to the violation was provided in our letter number HO-860239(O) dated February 27, 1986.

Please find attached our revised response to the subject violation which supercedes our February 27, 1986 response. It is considered that the corrective actions taken/planned are satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Yours very truly,



J. L. Willis  
Plant General Manager  
Harris Nuclear Project

MW:crm

Attachment

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

8604080322 860324  
PDR ADOCK 05000400  
G PDR

NBI-OS1

1/1 IE01

Attachment to CP&L Letter of Response to NRC Report RII:  
PAT 50-400/85-47-04

Reported Violacion:

10 CFR 50, Appendix B, Criterion V as implemented by CP&L accepted QA program (FSAR Chapter 17.2) requires that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. 10 CFR 50, Appendix B, Criterion XVII as implemented by CP&L accepted QA program (FSAR Chapter 17.2) requires that test records shall as a minimum, identify the inspector or data recorder, the type of observation, the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to these requirements, test procedure 1-2005-P-01, Revision 0, Hot Functional Test, approved December 11, 1985 provided acceptance criteria 7.1 and 7.2, which are vague and imprecise as follows:

- 7.1 Reactor Coolant System heat-up has been satisfactorily demonstrated within limitations listed or referenced in the steps of this procedure (Section 6.1).
- 7.2 Supporting Systems and Components have demonstrated satisfactory operation as described in the steps of this procedure.

Furthermore, as of December 20, 1985, the procedure steps and data sheets listed below did not prescribe quantitative, or qualitative acceptance criteria, normal operating ranges or limitations to evaluate the test results and the acceptability of the test data.

- 10.2 Reactor Coolant Pump Data
- 10.4 Incore Cooling (ICC) Monitor
- 10.5 #1 Seal Data w/RCP's Secured
- 10.8 #1 Seal data w/RCP's Energized
- 10.9 Containment Ventilation
- 10.18 CRDM Cooling Fan Temperature

In addition, the following sets of data do not have a verification signature and date to identify the data recorder for data sheets: 10.2, 10.4, 10.9, 10.10, 10.11, 10.12, 10.13, 10.14, 10.16, 10.18, 10.19, 10.20, 10.21, 10.22, and 10.23.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated. In the first part of the violation, the acceptance criteria in Section 7.1 and 7.2 of 2005-P-01 was vague in that it referenced steps in the procedure in general and should have been worded in a more precise manner. Procedure 2005-P-01 data sheets 10.2, 10.4, 10.5, 10.8, 10.9, and 10.18 listed data to be recorded without either providing definitive acceptance criteria or indicating that the data was being recorded for "baseline data" or "for information only". There was no method described to evaluate for acceptability of the data that was "for information only" but which did not have definitive acceptance criteria defined in the procedure.

The second part of the violation was due to CP&L's misinterpretation of the requirements for having a "data recorded by" signature or initials on each Data Sheet within a preoperational test procedure. CP&L's interpretation had been that when data was recorded on a Data Sheet at the direction of a procedural step within the body of the procedure which had an initial/date blank (\_\_\_\_\_/\_\_\_\_\_), that another signature on the Data Sheet was not required.

Corrective Steps Taken and Results Achieved:

Test procedure 2005-P-01 was revised to correct the violation as noted above. Data Sheets were revised to add acceptance criteria for data used for performance evaluation and to add signature blanks for each Data Sheet. Those Data Sheets that were used for recording baseline data were so annotated on the Data Sheets. This data will be reviewed by the Start-Up Engineer and Start-Up Supervisor for conformance to normal expected operating values, and the review documented in the procedure test report.

Corrective Steps Taken to Avoid Further Nonconformance:

A memorandum was issued to Start-Up Personnel reminding them of the requirement that preoperational test procedures have definitive acceptance criteria for any data recorded for the purpose of determining that equipment/systems meet design performance requirements or regulatory commitments. The memorandum further stated that any data recorded in the procedure during the course of the test for comparison to future operating conditions but which is not required for determining test acceptance should be identified as either "baseline data" or "for information only". Data recorded for "baseline" or "for information only" does not require acceptance criteria in the procedure, but the data must be reviewed by the Start-Up Engineer and Start-Up Supervisor for conformance to normal expected operating values and the review documented in the procedure test report. This requirement will be added to the Start-Up Manual in Section 11 and the definition of "baseline data" or "for information only" data clarified.

A review of preoperational test procedures, that were in progress or were approved at the time the violation was reported, was performed. Where acceptance criteria did not meet the above guidelines, the procedure is being corrected by TCN or procedure revision. Procedures not yet approved will be corrected prior to approval.

Data Sheet signature requirements have been reiterated to Start-Up Personnel. A review of preoperational tests that were in process of being performed or were approved at the time the violation was reported was performed. Where signature lines were found missing, they were added by TCN or will be added by revision or TCN before the test is performed. Procedures not yet approved will be corrected prior to approval. The Start-Up manual will also be revised to include the requirement for either initial/date or signature/date blanks on each Data Sheet.

For completed test procedures without initial or signature blanks on Data Sheets, the test report will be used to identify personnel recording data and memoranda to File written, reviewed by the Joint Test Group, and filed with the completed procedure. For completed test procedures without definitive acceptance criteria, the data will be evaluated by the Start-Up Engineer and Start-Up Supervisor. A memorandum to File will be written, reviewed by the Joint Test Group, and filed with the completed procedure evaluating the acceptability of the test results.

Date When Full Compliance Will be Achieved:

Full compliance is pending completion of the corrective actions as stated above. It is projected that full compliance will be achieved by April 15, 1986.