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 WATSON,R.A. Carolina Power & Light Co.
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SUBJECT: Responds to NRC 881122 ltr re violations noted in Insp Rept
 50-400/88-34.

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NOTES:Application for permit renewal filed.

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Carolina Power & Light Company

DEC 21 1988

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

File Number: SHF/10-13510E
Letter Number: HO-880246 (0)

NRC-655

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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 November 22, 1988, referring to I.E. Report RII: 50-400/88-34, 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. A. Watson
R. A. Watson
Vice President
Harris Nuclear Project

MGW:tbb

Enclosure

cc: Mr. W. H. Bradford (NRC - SHNPP)
Mr. B. C. Buckley (NRC)
Mr. M. L. Ernst (NRC - RII)

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Attachment to CP&L Letter of Response to NRC I.E. Report RII:
50-400/88-34 Violation "A"

Reported Violation:

Technical Specification 6.2.2.f requires that administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions, including key maintenance personnel. Deviations from guideline limits are required to be authorized by the plant general manager or his designee, with documentation of the basis for granting the deviation. The guideline limits on work hours include: 24 hours in any 48 hour period, and 72 hours in any 7 day period.

Contrary to the above, guideline limits on work hours for key maintenance personnel were exceeded without the required authorization during the period of July 30, 1988, through September 16, 1988. Noted were twenty-two instances of exceeding the limit of 72 hours in any 7 day period, and 12 instances of exceeding the limit of 24 hours in any 48 hours.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The violation occurred due to the lack of awareness by some personnel of the requirements of Technical Specification 6.2.2.f and Procedure MMM-001, Maintenance Conduct of Operation, concerning limits on overtime.

Corrective Steps Taken and Results Achieved:

A review was conducted of recent maintenance overtime. Discrepancies were identified to the Plant General Manager and subsequent approval was documented.

Corrective Steps Taken to Avoid Further Violation:

Maintenance foremen have received additional training on Technical Specification and MMM-001 requirements for overtime. A memorandum was issued by the maintenance manager to maintenance personnel reminding them of their responsibilities for ensuring proper approval of overtime. MMM-001 will be revised to require that maintenance supervisors conduct monthly reviews of overtime. Signs will be posted in maintenance shops to remind personnel of overtime approval requirements.

Date When Full Compliance Will Be Achieved:

Full compliance is pending revision to MMM-001 to include the maintenance supervisory review and posting of signs in the maintenance shops as stated above. These actions are expected to be completed by January 31, 1989.