



Carolina Power & Light Company
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William R. Robinson
Vice President
Harris Nuclear Plant

JAN 10 1996

SERIAL: HNP-95-126
10 CFR 2.201

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

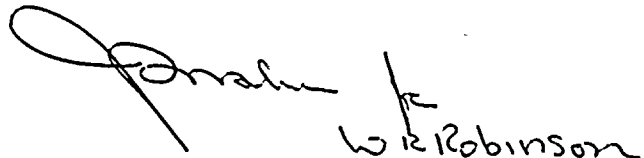
SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
REPLY TO NOTICE OF VIOLATIONS (NRC INSPECTION REPORT NO. 50-400/95-17)

Gentlemen:

Attached is Carolina Power & Light Company's reply to the Notice of Violations described in Enclosure 1 of your letter dated December 11, 1995.

Questions regarding this matter may be referred to Mr. T. D. Walt at (919) 362-2711.

Sincerely,



W R Robinson

MGW

Attachment

c: Mr. S. D. Ebner
Mr. N. B. Le
Mr. D. J. Roberts

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**REPLY TO NOTICE OF VIOLATIONS
NRC INSPECTION REPORT NO. 50-400/95-17**

Reported Violation A:

Technical Specification 6.8.1.a requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operations)." Appendix A of Regulatory Guide 1.33, Section 8.b.(ee) includes surveillance procedures for turbine overspeed trip tests.

Procedure OPT-1075, Revision 0, Turbine Mechanical Overspeed Trip Test, was the licensee's procedure which implemented the requirements of TS 6.8.1.a for turbine overspeed tests. Step 7.0.15 of OPT-1075 directed personnel to place the Digital Electro-Hydraulic Control (DEHC) control panel test switch in the "OVERSPEED TEST PERMISSIVE" position during overspeed testing.

Contrary to the above, on October 12, 1995, while conducting turbine overspeed trip testing, the licensee failed to follow procedure OPT-1075 when a control room operator placed the DEHC control panel test switch in the "OPC TEST" position instead of the "OVERSPEED TEST PERMISSIVE" position. After the switch was returned to its pretest position, an automatic turbine trip and subsequent reactor trip occurred.

Denial or Admission of Violation A:

The violation is admitted.

Reason for the Violation:

This information was contained in previously submitted Licensee Event Report (LER) 95-010, dated November 13, 1995.

Corrective Steps Taken and Results Achieved:

This information was contained in previously submitted LER 95-010, dated November 13, 1995. The status of corrective actions which were not completed at the time of the LER submittal is as follows:

- 1) The corrective action to complete the Engineering Service Request (ESR) and to install permanent switch position indicating marks on the Main Control Board and Simulator Overspeed Protection Controller (OPC) switches was completed on January 5, 1996.
- 2) The corrective action to provide training for operators which included a review of this event, inappropriate acts, root causes, causal factors, corrective actions, and the operation of the DEH system, specifically addressing the OPC switch and how to recognize/respond to abnormal events in general, was completed on December 18, 1995.



Corrective Steps That Will Be Taken to Avoid Further Violations:

This information was contained in previously submitted LER 95-010, dated November 13, 1995. The status of the corrective action which was being taken to prevent further violations but was not completed at the time of the LER submittal is as follows:

Providing refresher teamwork training for operators that emphasize the use of command and control, communications, human error reduction techniques, and reinforces the use of these techniques during simulator training will be completed by July 28, 1996.

Date When Full Compliance Was Achieved:

Full compliance was achieved on October 12, 1995, upon recognition of the personnel error and with the stabilization of the plant following the turbine trip and subsequent reactor trip.

Reported Violation B:

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures, and Drawings, requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

The licensee's Corporate Quality Assurance Program Manual, Revision 17, states in section 6.3, Procedures and Drawings, that the accomplishment of activities affecting quality shall be in accordance with approved procedures and/or drawings which are appropriate to the circumstances. It further states, in part, that procedures and drawings shall include qualitative/quantitative acceptance criteria and inspection points as applicable.

Contrary to the above, the licensee failed to provide appropriate approved procedures and/or drawings for maintenance activities on safety-related valves, in that:

1. As of October 23, 1995, the licensee failed to provide appropriate procedures on how to inspect/repair the "C" main feedwater isolation valve 1FW-217 seal ring seating surfaces. The lack of appropriate procedures resulted in this safety-related containment isolation valve being returned to service after maintenance activities in a degraded condition.
2. As of September 23, 1995, the licensee failed to provide appropriate work practices for outage maintenance work on pressurizer PORV PCV-444B, a safety-related valve required by Technical Specifications for reactor overpressure protection. The work package contained no instructions on how to disassemble or reassemble the valve.

This is a Severity IV violation (Supplement I).

Denial or Admission of Violation B:

The violation is admitted.

Reason for the Violation:

During initial development of plant maintenance procedures, there was a failure to properly implement Regulatory Guide (R.G.) 1.33, Quality Assurance Program Requirements (Operations) Appendix A as required by Technical Specification 6.8.1.a. The repair work on these valves was considered to be within the "skill of the craft" and therefore was not determined to require detailed procedures.

Corrective Steps Taken and Results Achieved:

Procedure CM-M0204, Main Feedwater Isolation Valve (FWIV) Pressure Seal Bonnet Inspection and Installation was developed and approved on October 25, 1995 with a subsequent revision on October 27, 1995. The procedure was used to perform the inspection and reassembly of 1FW-217.

Administrative controls have been implemented to determine if a procedure is required per R.G. 1.33. Instructions have been provided requiring that during the planning, review, and implementation of Work Requests, if an appropriate procedure is not identified to perform the work and one is required, it will be developed prior to the work being performed. This instruction was issued on January 9, 1996.

The causes and circumstances of this violation and the lessons learned from this event have been reviewed with maintenance supervisors and appropriate maintenance planning personnel. This action was completed on January 9, 1996.

Corrective Steps That Will Be Taken to Avoid Further Violations:

Procedure CM-M0204 will be revised to also incorporate the appropriate disassembly instructions for the FWIVs. A procedure for pressurizer power operated relief valves (PORVs) containing appropriate disassembly, inspection, and reassembly instructions will be developed. These two actions will be completed prior to any future disassembly of these valves and no later than April 1, 1996.

A review of maintenance activities which could affect the performance of safety-related equipment in accordance with R.G. 1.33 will be completed by February 29, 1996, to identify those components requiring detailed procedures. For identified components, detailed procedures will either be (1) verified to be already in place or (2) developed and approved prior to any further maintenance on these components.

Other organizational areas will be assessed to ensure that R.G. 1.33 and Technical Specification 6.8.1.a are properly implemented. This action will be completed by February 15, 1996.

Date When Full Compliance Was Achieved:

Full compliance was achieved on January 9, 1996, with the issuance of the above stated interim instructions.