

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 FACIL: 50-400 Shearon Harris Nuclear Power Plant, Unit 1, Carolina
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 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-005-00: on 980420, TS verbatim non-compliance was determined. Caused by incorrect interpretation of TS requirements. Memo issued to reemphasize need to comply w/literal meaning of TS requirements in verbatim manner. W/980520 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company
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MAY 20 1998

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Serial: HNP-98-075
10CFR50.73

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1
DOCKET NO. 50-400
LICENSE NO. NPF-63
LICENSEE EVENT REPORT 1998-005-00

Sir or Madam:

In accordance with 10CFR50.73, the enclosed Licensee Event Report is submitted. This LER describes several violations of the literal meaning of Technical Specification requirements.

Sincerely,

J. W. Donahue
Director of Site Operations
Harris Plant

Lezz

MV

Enclosure

c: Mr. J. B. Brady (HNP Senior NRC Resident)
Mr. L. A. Reyes (NRC Regional Administrator, Region II)
Mr. S. C. Flanders (NRC - NRR Project Manager)

5413 Shearon Harris Road New Hill NC

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EXPIRES 04/30/98

LICENSEE EVENT REPORT (LER)

(See reverse for required number of
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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 (T-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)

Technical Specification verbatim non-compliance.

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
4	20	98	98	-- 005	-- 00	05	20	98	FACILITY NAME	DOCKET NUMBER
										05000
OPERATING MODE (9)		1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)			20.2203(a)(2)(v)		X	50.73(a)(2)(i)	50.73(a)(2)(viii)
POWER LEVEL (10)		100%	20.2203(a)(1)			20.2203(a)(3)(i)			50.73(a)(2)(ii)	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

Michael Verrilli Sr. Analyst - Licensing

TELEPHONE NUMBER (Include Area Code)

(919) 362-2303

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On April 20, 1998, with the plant at approximately 100% power in Mode 1, several instances of past non-compliance with Technical Specification (TS) requirements were determined to be reportable. These TS violations were self-identified as a result of investigations initiated to ensure verbatim compliance with the most conservative and literal meaning of TS requirements. The following sequence of events led to this LER; On February 24, 1998, the NRC issued its SALP Report for the Harris Nuclear Plant (HNP). This SALP report contained a statement regarding "the lack of clear understanding of some Technical Specification requirements." As a result of this statement, HNP management issued a memorandum reemphasizing the need for verbatim compliance with the literal meaning of TS requirements and initiated an investigation into the matter. While reviewing the HNP management memo, Operations personnel questioned past compliance with TS 3.8.1.1 for "required, redundant features." Guidance for this TS requirement was contained in a HNP Technical Specification Interpretation (TSI 89-003). A second investigation to resolve this TS compliance issue, as well as other TS that may have been adversely impacted by TSIs was immediately initiated. Subsequent to the initiation of this investigation, the Senior NRC Resident questioned if past testing of the Component Cooling Water System had been performed with the plant at power, rather than "During Shutdown," as required by TS prior to removal of the "During Shutdown" requirement by a pending license amendment request. A third investigation was initiated to resolve this TS testing question.

These conditions were each caused by an incorrect interpretation of Technical Specification requirements. Four non-compliance conditions were related to improper HNP Technical Specification Interpretations and were caused by a combination of; (1) conflicting and/or ambiguous TS requirements, (2) an ingrained culture at HNP that TSIs were appropriate and that it was acceptable to rely on the inferred intent of the TS, and (3) a belief that TS changes were not always required. Four non-compliance conditions related to testing "During Shutdown" were caused by a failure to follow the literal requirement to perform these tests while the plant was in a shutdown mode.

Immediate corrective actions included the management memorandum mentioned above, the issuance of an Operations Night Order to clarify the use of TSIs, and the cancellation of TSIs which were in contradiction with the literal meaning of TS. Further actions will include training and procedure revisions.

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

EVENT DESCRIPTION:

On April 20, 1998, with the plant at approximately 100% power in Mode 1, several instances of past non-compliance with Technical Specification (TS) requirements were determined to be reportable. These TS violations were self-identified as a result of investigations initiated to ensure verbatim compliance with the most conservative and literal meaning of TS requirements. The following sequence of events led to this LER. On February 24, 1998, the NRC issued its SALP Report for the Harris Nuclear Plant (HNP). This SALP report contained a statement regarding "the lack of clear understanding of some Technical Specification requirements." As a result of this statement, HNP management (the Plant General Manager) issued a memorandum on March 18, 1998, reemphasizing the need for verbatim compliance with the literal meaning of TS requirements and initiated an investigation into the matter. While reviewing the HNP management memo, Operations personnel questioned past compliance with TS 3.8.1.1 (Electrical Power Systems - A.C. Sources). This compliance question was in regards to the verification of the required redundant features statement in Action Statement 3.8.1.1.b.4. Guidance for this TS requirement had previously been provided in a HNP Technical Specification Interpretation (TSI 89-003). A second investigation to resolve this TS compliance issue, as well as others that may have been impacted by TSIs was immediately initiated. The results of this investigation are listed below. Subsequent to the initiation of this investigation, the Senior NRC Resident questioned if past testing of the Component Cooling Water System had been performed with the plant at power, rather than "During Shutdown" as required by TS prior to removal of the "During Shutdown" requirement by a pending license amendment request (submitted to the NRC on March 17, 1997). Specifically, TS 4.7.3.b.3 (Component Cooling Water System) states that "At least once per 18 months during shutdown: each automatic valve serving the gross failed fuel detector actuates to its correct position on a low surge tank level test signal." To resolve the NRC Resident's question, a third investigation was initiated.

This LER provides the reportable aspects of each of the three investigations performed related to the overall TS compliance issue. The following eight instances were identified during these investigations where the literal meaning of the TS were not complied with in a verbatim manner. The first four instances involved inadequate Technical Specification Interpretations that resulted in a reportable condition. In order to identify any actual Technical Specification violations, we reviewed historical plant data and records for a period of one year or until a violation was identified.

1. TSI 91-004 "Metal Impact Monitoring System Channel Definition" - clarified the definition of "channel" in TS 3/4.3.3.9 "Metal Impact Monitoring System"
TS 3.3.3.9 requires that "With one or more Metal Impact Monitoring System (MIMS) channels inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the channel(s) to OPERABLE status." Guidance provided in TSI 91-004 incorporated the definition of "channel" contained in NRC Regulatory Guide 1.133, without revising the specific words of TS. As a result the following condition occurred. Channel #751 of the Metal Impact Monitoring System monitors the "Reactor Vessel Upper" collection region. In July 1997, intermittent noise was experienced in the MIMS Main Control Room Cabinet and the channel was declared inoperable on July 19, 1997. Troubleshooting determined that the most probable source of this noise was the Channel #751 pre-amplifier/accelerometer sensor located in containment. To eliminate this source of intermittent noise and enhance the operational reliability of MIMS during plant full power operation, a temporary plant modification was developed to lift the cable leads for this sensor from the back of the Main Control Room MIMS cabinet. By lifting these leads the Channel #751 pre-amplifier/accelerometer sensor was separated from the system eliminating the source of noise. This channel was considered to be a spare and was not being used to monitor the presence of a loose part or to detect metal impact. The redundant channel (Channel #750) for the "Reactor Vessel Upper" collection region has remained fully operational. Based on the guidance of Regulatory Guide 1.133, this condition was not originally considered as an inoperable MIMS "channel". Following additional review and application of the literal meaning of the exact words in the Technical Specification LCO, (regarding the word "channel") it was determined that the channel #751 inoperability was reportable. A Special Report was submitted on May 14, 1998. However, this condition is reportable as a TS violation for not meeting the initial 10-day reporting requirement starting on July 19, 1997. A license amendment request to address this issue is planned.

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2. TSI 96-002 "Loss of Off-Site Power" - provided guidance for TS 3/4.3.2 "Engineered Safety Features Actuation System Instrumentation."
- TS 3/4.3.2 requires a minimum of two channels per bus operable for the loss of offsite power 6.9 kV emergency bus undervoltage relays. Each safety bus has three primary and three secondary undervoltage relay. There is no specific action statement for less than 2 channels (primary and/or secondary relays). Guidance provided in TSI 96-002 stated that "with more than one primary or secondary undervoltage relay inoperable on the same safety bus, then the associated bus and diesel generator are inoperable and the actions associated with the inoperable bus and diesel generator are applied." This TSI was based on the fact that during a loss of off-site power, the safety bus undervoltage relays only provide input to one train's function. Therefore, if more than one undervoltage relay is inoperable on one safety bus, only that bus is affected. The other safety bus remains operable under the requirements of TS 3.3.2 Table 3.3-3, Item 9. Thus, the effect of having two or more undervoltage relays inoperable on the same safety bus is to make the associated safety bus and diesel generator inoperable. The HNP design for performing a trip actuating device operational test (TADOT) results in both the primary and secondary 6.9 Kv emergency bus undervoltage relays being blocked by actuation of a test relay and associated contacts. During the time that this test relay is energized and blocking the relay outputs, the primary and secondary emergency bus undervoltage relays will be unable to perform their required safety function and, therefore, must be considered inoperable. Because this condition actually only affected one safety bus, the guidance of TSI 96-002 was considered to be valid. However, this guidance ignored the specific action requirement of TS 3.3.2, Table 3.3-3, Item 9. As a result, past testing of these relays actually resulted in TS 3.0.3 entry, which is reportable as a TS violation. A license amendment has been submitted to the NRC to resolve this testing issue, but has not yet been approved. TADOT testing for each of the 6.9 kV emergency bus relays (and the resulting TS 3.0.3 entries) was most recently performed on May 8, 1998. NRC approval and HNP implementation of the license amendment is expected prior to the next scheduled TADOT test.
3. TSI 89-003 "Requirements for Operable Emergency Power Sources" - provided guidance for TS 3/4.8.1.1 "Electrical Power Systems - A.C. Sources"
- Action statement b.4 of TS 3/4.8.1.1 requires that "With one diesel generator inoperable: Verify required feature(s) powered from the OPERABLE diesel generator are OPERABLE. If required feature(s) powered from the OPERABLE diesel generator are discovered to be inoperable at any time while in this condition, restore the required feature(s) to OPERABLE status within 4 hours from discovery of inoperable required feature(s) or declare the redundant required feature(s) powered from the inoperable A.C. source as inoperable and be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours or within the ACTION time of the applicable ACTION statement(s) for the inoperable required feature(s), whichever is more limiting." Guidance provided in TSI 89-003 defined those components that would be considered inoperable if their associated diesel generator was inoperable and excluded required feature(s) that were powered from the DC busses or the inverters, or which could perform their function without AC power. It also excluded components whose individual TS would be less restrictive with both trains inoperable. This guidance contradicts a conservative and literal meaning of the words of TS 3.8.1.1.b.4. The most conservative interpretation of the required redundant feature of the specification would require a plant shutdown when both Fuel Handling Building Emergency Exhaust (FHBEES) Fans are inoperable due to the loss of electrical power. However, the FHBEES LCO would only require suspension of fuel movement. During a period from July 21, 1997 until October 2, 1997, the E-12 A-Train Fuel Handling Building Emergency Exhaust Fan was inoperable. Within this period, on August 13, 1997, the B-Train Emergency Diesel Generator was also inoperable for a period of greater than 10 hours. The operators applied the FHBEES LCO and did not apply the most conservative required redundant feature interpretation, which violated the TS requirement to be in hot standby. This condition is reportable as TS violation. A license amendment request was submitted on October 29, 1997 to address this issue.

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4. TSI 95-004 "Personnel Airlock Interlock Operability" - provided guidance for TS 3/4.6.1.3 "Containment Airlocks"

TS 3.6.1.3 contains no specific actions for an inoperable Personnel Airlock (PAL) interlock. In the absence of this needed information, TSI 95-004 was generated to provide guidance on operability of the PAL interlock and what actions were required in the event that the interlock became inoperable. This guidance was based on the corresponding airlock LCO contained in the new Westinghouse Standard Technical Specifications (NUREG-1431). Nevertheless, the TSI guidance contradicted the literal meaning of TS 3.6.1.3 by providing an alternative solution to allow continued airlock operability when the electrical interlock is inoperable. When the interlock is inoperable, a more conservative action would have been to declare the airlock inoperable and apply TS 3.6.1.3 action b. The alternative solution provided by the TSI did not actually return the containment airlock to an operable status. Application of this inadequate guidance caused the following reportable condition. On July 25, 1997, the PAL interlock was declared inoperable due to the failure of the inner PAL door to open and the resulting need for local, manual operation of the door. The actions provided by TSI 95-004 were taken as a result. This included verifying the operable PAL door closed within one hour and hanging a caution tag on the RAB side local door control panel. The PAL interlock was then repaired, tested satisfactorily and restored to operable status on July 30, 1997. By applying the TSI guidance, the requirement to restore operability in 24 hours, or be in at least hot standby in the next 6 hours and cold shutdown within the following 30 hours was violated. A license amendment request to address this issue is planned.

The next four reportable instances involved a failure to comply with the TS requirement to perform testing "During Shutdown." A license amendment request was submitted to the NRC on March 17, 1997 to remove the "During Shutdown" stipulation for testing that could be safely performed at power. However, the provisions of this amendment request were inappropriately implemented prior to NRC approval of the amendment request.

1. Testing to verify that CCW is isolated to the Gross Failed Fuel Detector on a CCW Surge Tank low level per TS 4.7.3.b.3 has been performed by MST-I0178 and MST-I0179. These MSTs have been routinely performed at power while in Mode-1. The NRC Senior Resident questioned this possible testing deficiency and immediate investigation determined that satisfactory testing had been performed during the most recent test interval while shutdown on September 6, 1996 (MST-I0178) and during RFO7 on May 22, 1997 (MST-I0179). However, testing to verify this isolation function has not been normally performed while shutdown during previous Refueling Outages. This constitutes a violation of the TS surveillance requirement to perform this test "during shutdown." This condition has existed since the initial development and scheduling of MST-I0178 and MST-I0179.
2. Testing to verify that the both EDGs start on a SI test signal and operates in standby for 5 minutes per TS 4.8.1.1.2.f.5 has been satisfactorily performed by OST-1825 or OST-1826 during each of the previous Refueling Outages except RFO6. A revision was performed prior to RFO6 that removed the "A" EDG test portion from the scope of OST-1825 and placed testing of the "A" EDG into OST-1085, which was performed just prior to RFO6 on August 30, 1995. This constitutes a violation of the TS surveillance requirement to perform this test "during shutdown."

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3. Testing to verify that the AFW Pressure Control Valves "respond as required" per TS 4.7.1.2.1.b.1 has been performed in the past by OST-1087. This testing ensures that the PCVs control AFW pump discharge pressure and prevent a pump run-out condition. OST-1087 was satisfactorily performed and demonstrated that the AFW PCVs performed as required during Refueling Outages 1, 2, 3 and 4. However, prior to Refueling Outage 5, OST-1087 was revised to no longer take credit for testing the AFW PCVs. In Refueling Outages 5 and 6, OST-1825 and OST-1826 were credited for verifying AFW PCV operability, but this was incorrect in that the PCVs were not being tested in a sequence that would actually verify operability. This deficiency was identified in CR #96-2578 and was reported to the NRC in LER 96-02. As a result of this CR and LER, OST-1087 was revised to once again properly test the AFW PCVs. However, OST-1087 was not performed while shutdown during RFO7. OST-1087 was performed on April 1, 1997, which was four days prior to the start of RFO7. This constitutes a violation of the TS surveillance requirement to perform this test "during shutdown."
4. Testing to verify the operability of 3SC-41 (Screen Wash Isolation Valve) per TS 4.7.4.b.1 has been satisfactorily performed in the past by OST-1214 since June 1995. However, this testing has routinely been performed at power while in Mode-1. Prior to June 1995 a testing deficiency existed in that 3SC-41 was only being stroke time tested to satisfy ISI requirements and was not being tested via the Screen Wash Pump auto start contacts. This condition was identified in CR #95-3542 and reported to the NRC in LER #95-03. As a result of the CR and LER, OST-1214 was revised to properly test 3SC-41. However, OST-1214 has not been performed while the plant was shutdown. This constitutes a violation of the TS surveillance requirement to perform this test "during shutdown."

In addition to the above described reportable conditions, the following TSIs were determined by investigation to contradict the literal meaning of TS requirements. Research into these TSIs and the effect they may have had on operability of plant equipment did not reveal further instances of TS non-compliance.

1. TSI 87-002 "HVAC Operability Requirements" provided guidance to determine the effect of out of service ventilation units powered by the safety busses on equipment required by TS. There are no specific TS requirements pertaining to safety related ventilation units. However, the guidance contained in TSI 87-002 regarding the AH-12 and AH-13 (Switchgear Room Air Handling Units) implemented a 72 hour LCO period which was less restrictive than the actual most limiting LCO. The engineering judgement used to initially establish the 72 hour LCO period has been brought into question, since the support equipment has a more limiting LCO.
2. TSI 87-006 "Gaseous Waste Processing System - Recombiner Instrumentation" provided guidance related to the operability requirements for the hydrogen recombiner to oxygen and hydrogen monitors. However, the guidance contained in TSI 87-006 regarding compensatory grab samples contradicts TS 4.11.2.5 requirements by allowing grab samples to be performed once per 24 hours rather than once per 12 hours.
3. TSI 89-005 "Sequencer and SSPS" provided guidance on the inoperability of the solid state protection system (SSPS) and the emergency safeguards sequencer. However, TS 3.3.2 has specific minimum requirements and associated action statements for when those requirements are not met. The guidance contained in TSI 89-005 contradicts TS 3.3.2 by allowing application of the LCO for the specific TS component affected by the inoperable SSPS relay. The TSI further contradicts TS 3.3.2 by stating that inoperabilities should not result in more restrictive action requirements than the component itself would require.

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4. TSI 95-002 "Post-Maintenance Leak Testing of RCS Pressure Isolation MOVs" clarified the types of maintenance activities that warranted the performance of a subsequent leak test. The guidance contained in TSI 95-002 contradicts TS 4.4.6.2.c, by allowing a leak seat test to be waived for a valve packing adjustment if an Engineering Service Request (evaluation) indicates seat leakage is unaffected. This waiver is not consistent with the literal words of TS 4.4.6.2.2.c which requires a leak test to be done for maintenance, repair or replacement work on the valve.
5. TSI 95-003 "Ultimate Heat Sink" clarified actions to be taken related to main and auxiliary reservoir level and temperature. The guidance contained in TSI 95-003 contradicts TS 3.7.5. However, the TSI imposes more conservative level and temperature limitations to ensure continued Emergency Service Water System and Diesel Generator operability.

CAUSE:

Each of these conditions were caused by an incorrect interpretation of Technical Specification requirements. The first four non-compliance conditions were related to improper HNP Technical Specification Interpretations and were caused by a combination of; (1) conflicting and/or ambiguous TS requirements, (2) an ingrained culture at HNP that TSIs were appropriate and that it was acceptable to rely on the inferred intent of the TS, and (3) a belief that TS changes were not always required.

The next four non-compliance conditions were related to testing "During Shutdown" and were caused by a failure to follow the literal requirement to perform these tests while the plant was in a shutdown mode. An incorrect philosophy existed at HNP in the past among plant personnel and plant management that contributed to this non-compliance. In certain cases, it was considered acceptable to perform testing at power as long as it was within the 18 month surveillance interval, was consistent with safe plant operation, and plant conditions would allow satisfactory test completion. This was evidenced by the approach taken during the initial development and scheduling of OST-1214 to test 3SC-41 and also MST-I0178 and MST-I0179 testing of the isolation of CCW to the Gross Failed Fuel Detector. These tests have never been regularly scheduled to be performed while shutdown.

It was also considered acceptable in some cases to satisfy the "During Shutdown" Technical Specification requirement if the last test or portion of testing was completed while the plant was in a shutdown mode. This applied to TS surveillances that required multiple test procedures to be performed at different times in different modes to fully satisfy the TS requirement. In these cases, a portion of the multiple tests would be performed while at power and the TS requirement would be considered "met" when the final portion of testing was completed during an outage. This philosophy appeared to be consistent with industry practice in the 1995 time frame and also led to the development of OST-1844 in August 1995. OST-1844 (Slave Relay Component Operability Verification) gathers information from previously completed surveillance tests and documents the completion of the final portion of slave relay testing while shutdown. This philosophy was further indicated as acceptable by plant management in March 1995, when a proposed Technical Specification Change (TSC #94-09) was canceled prior to submittal to the NRC. This TSC was written to remove the "during Shutdown" requirement from Technical Specifications where appropriate, but was considered by management to be an unnecessary clarification. Subsequently, the TSC was re-developed and submitted to the NRC on March 17, 1997.

SAFETY CONSEQUENCES:

There were no actual safety consequences resulting from the failure to comply in a verbatim manner with the literal meaning of the applicable TS requirements. The four violations resulting from inadequate TSIs had no adverse impact on plant operation or safety. In the four "during shutdown" TS violations, adequate testing had been performed to verify operability of the components in question, however, it was not performed while the plant was in a shutdown mode as required. These conditions are being reported as conditions prohibited by Technical Specifications per 10CFR50.73.a.2.i.B.

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PREVIOUS SIMILAR EVENTS:

On 2-24-98 the NRC issued Inspection Report No. 50-400/98-99, the SALP for the Harris Plant. The report contained the following statement in the Plant Operations functional area: "The lack of clear understanding of some Technical Specifications requirements by licensed operators and management staff has been demonstrated during several events." This is the subject of another root cause investigation under CR-98 00652.

Several HNP LERs (94-01, 95-01, 95-03, 95-07, 96-02, 97-08, 97-11) have been submitted to the NRC and were caused by Technical Specification Surveillance testing deficiencies. A comprehensive surveillance test review project is currently in progress in conjunction with HNP's conversion to the new MERITS standard Technical Specifications, to help resolve these testing problems.

CORRECTIVE ACTIONS COMPLETED:

1. Following the NRC SALP Report issued on February 24, 1998, a memorandum was issued by the HNP Plant General Manager on March 18, 1998 to reemphasize the need to comply with the literal meaning of TS requirements in a verbatim manner.
2. An Operations Night Order was issued on May 8, 1998 to provide interim guidance and prevent the use of the conflicting TSIs.
3. The following Technical Specification Interpretations that contradicted the literal meaning of the TS requirements have been canceled; 87-002, 87-006, 89-003, 89-005, 91-004, 95-002, 95-003, 95-004, and 96-002. This was completed on May 20, 1998.
4. License Amendment 77 to the Harris Plant Operating License was approved and issued by the NRC on April 14, 1998. The amendment was implemented on April 15, 1998 to remove the "During Shutdown" requirement where appropriate.

CORRECTIVE ACTIONS PLANNED:

1. Training will be conducted on TS compliance and NRC Generic Letter 91-18 for licensed individuals, Operations and Maintenance procedure writers, System Engineers, and key station management, including PNSC members. This training will be completed by August 15, 1998.
2. Plant Procedure OST-1825 "Safety Injection - ESF Response Time Testing, 18 month Interval" will be revised to ensure proper testing per TS 4.8.1.1.2.f.5 during Refueling Outage 8, which is currently scheduled to begin in October 1998.
3. The remaining TSIs which do not conflict with TS will be canceled by May 29, 1998.
4. Plant procedures AP-013 "Plant Nuclear Safety Committee" and AP-107 "Technical Specification Interpretations" will be revised to clarify TS verbatim compliance requirements. This will be completed by May 29, 1998.

