

**CP&L**  
**Carolina Power & Light Company**  
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R. B. RICHEY  
Manager  
Harris Nuclear Project

**MAY 31 1990**

Letter Number: HG-900097 (O)

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

NRC-715

SHEARON HARRIS NUCLEAR POWER PLANT  
DOCKET NO. 50-400  
LICENSE NO. NPF-63  
REPLY TO A NOTICE OF VIOLATION

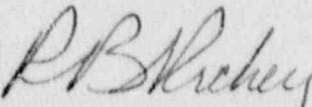
Gentlemen:

In reference to your letter of May 4, 1990, referring to I.E. Report RII: 50-400/90-06, the attached is Carolina Power and Light Company's reply to violation "B" 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. B. Richey, Manager  
Harris Nuclear Project

MGW:msb

Enclosure

cc: Mr. R. A. Becker (NRC)  
Mr. S. D. Ebnetter (NRC - RII)  
Mr. J. E. Tedrow (NRC - SHNPP)

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ATTACHMENT TO CP&L LETTER OF RESPONSE  
TO NRC I.E. REPORT RII: 50-400/90-06  
VIOLATION "B"

Reported Violation:

Technical Specification 6.8.1.a requires that written procedures be established and implemented covering procedures outlined in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix A, paragraph 9 requires procedures for the conduct of maintenance activities.

Operation Management Manual OMM-003, Equipment Inoperable Record, section 5.2.1, provides the steps necessary to restore an inoperable component to operable status following the completion of maintenance and requires that all related post maintenance test requirements be satisfactorily completed.

Contrary to the above,

1. On March 16, 1990, valve ISP-916 was declared operable following the performance of maintenance without a required post maintenance leak test being conducted.
2. On March 22, 1990, valve ISI-1 was declared operable following the performance of maintenance without a required post maintenance valve cycling and timing test being conducted.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

The cause of the failure to perform the required leak test on ISP-916 following maintenance is considered to be due to the absence of a requirement for operations personnel to consult all available sources for surveillance tests required for operability, and the absence of a requirement to complete all reviews prior to declaring a component operable following Priority/Emergency Maintenance.

The cause of the failure to stroke and time ISI-1 was an oversight on the part of the operator documenting the test. (ISI-2 was properly tested by the same individual on the same day).

Corrective Steps Taken and Results Achieved:

A leak rate test was performed satisfactorily on valve ISP-916 after the omission of the test was discovered.

ISI-1 was stroked and timed satisfactorily when the omission of the test was discovered.

Corrective Steps Taken to Prevent Further Violations

Procedure OMM-003 has been revised to require operations personnel to review the applicable procedures (i.e. PLP-400, ISI-801, etc.) for actions prior to declaring a component operable. The revision to OMM-003 also requires operations to complete their reviews prior to declaring the component operable following Priority/Emergency Maintenance. This revision to OMM-003 will be included in the "Required Reading" for operations personnel.

The operator who omitted the stroking and timing of ISI-1 will be counseled concerning the error.

Date Full Compliance Will Be Achieved:

Full compliance will be achieved by June 29, 1990.