



Carolina Power & Light Company

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

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Letter Number: HO-850478 (O)

NRC-406

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

Dear Dr. Grace:

In reference to your letter of November 14, 1985 and Inspection Report RII: MDH 50-400/85-39, the attached is Carolina Power and Light Company's reply to the violation identified in the inspection report.

It is considered that the corrective action taken is satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Yours very truly,

J. L. Willis  
Plant General Manager  
Shearon Harris Nuclear Power Plant

DLT/jsb

Attachment

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

NBI-OS1

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PDR ADOCK 05000400  
G PDR

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Reported Violation:

10 CFR 50.54(a)(1) requires the licensee to implement the quality assurance program described or referenced in its Safety Analysis Report. Section 17.2.5 states that the SHNPP QA Program establishes the requirements for prescribing and accomplishment of activities affecting quality in accordance with instruction, procedures, and/or drawings. Maintenance Procedure MMM-011, Section 5.3 requires open pipe ends to be sealed unless required for operations.

Contrary to the above, (A) open temporary instrument sensing lines were found connected to the manifold valves for Flow Transmitters Nos. FT-1SI-940S and FT-1SI-943S and, (B) the instrument air lines to valves 3CC-L1-SA and 3CC-L2-SB were found disconnected at several places and open to atmosphere.

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

Denial or Admission and Reason for the Violation:

The violation is correct as stated.

- (A) The temporary instrument sensing lines found connected to the manifold valves for Flow Transmitters Nos. FT-1SI-940S and FT-1SI-943S were installed to facilitate connecting temporary test gauges to support preoperational testing. The installation and removal of the temporary tubing and delta-pressure gauges was performed by Maintenance personnel using a Work Request and Authorization Form (WR&A). Upon removal of the subject test gauges for recalibration and verification the temporary tubing remained in place to support further testing and was inadvertently left uncapped.
- (B) The instrument air lines to valves 3CC-L1-SA and 3CC-L2-SB were disconnected to perform tubing and electrical modifications to the subject air operated valves. This work was authorized by a Construction Work Authorization Request (CWR&A). Investigation into the problem indicates that the tubing modifications were completed by Construction Instrumentation personnel, but the electrical connections were not completed to the solenoid operated valves. In order to operate the Component Cooling Water System valves to support start-up testing in progress, the new air supply tubing was temporarily disconnected to run an air supply to the old solenoids. In the process, the new air supply tubing was inadvertently left open ended.

Corrective Steps Taken and Results Achieved

- (A) The temporary tubing has been removed, the temporary test connection flushed, and the test connection plugged with a suitable stainless steel pipe plug.
- (B) The subject valves have now been permanently tubed and wired.

Corrective Steps Taken to Avoid Further Noncompliance:

- (A) The applicable Start-Up personnel have been reinstructed to comply with good work practices concerning test equipment in general and open ended tubing and piping specifically. I&C Maintenance craft are being reinstructed in the requirements of Section 5.3 of Maintenance Procedure MMM-011. Section 5.3 requires that openings and pipe ends be sealed at all times unless they must be unsealed to carry out necessary operations. This reinstruction is projected to be complete by December 31, 1985.
- (B) Start-Up personnel have been instructed that before closing a CWR&A, verify all work covered on the CWR&A has been performed, equipment has been left as designed, and no open tubing connections exist.

Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by December 31, 1985.