



Carolina Power & Light Company  
Harris Nuclear Plant  
PO Box 165  
New Hill NC 27562

MAR 23 2000

U.S. Nuclear Regulatory Commission  
ATTN: NRC Document Control Desk  
Washington, DC 20555

Serial: HNP-00-061  
10CFR50.73

SHEARON HARRIS NUCLEAR POWER PLANT UNIT 1  
DOCKET NO. 50-400  
LICENSE NO. NPF-63  
LICENSEE EVENT REPORT 2000-001-00

Sir or Madam:

In accordance with 10CFR50.73, the enclosed Licensee Event Report is submitted. This report describes a Technical Specification violation due to an inoperable Control Room Emergency Filtration System.

Sincerely,

R. J. Duncan II  
General Manager  
Harris Plant

MSE/mse

Enclosure

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

IE22

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1) <p style="text-align:center">Harris Nuclear Plant, Unit 1</p>	DOCKET NUMBER (2) <p style="text-align:center">05000400</p>	PAGE (3) <p style="text-align:center">1 OF 2</p>
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TITLE (4)  
Control Room Emergency Filtration System Technical Specification violation.

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
02	22	2000	2000	- 001	-- 00	03	23	2000	FACILITY NAME	DOCKET NUMBER <p style="text-align:center">05000</p>
									FACILITY NAME	DOCKET NUMBER <p style="text-align:center">05000</p>
OPERATING MODE (9)		1		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check one or more) (11)						
POWER LEVEL (10)		100		20.2201(b)		20.2203(a)(2)(v)		X	50.73(a)(2)(f)	50.73(a)(2)(viii)
				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
				20.2203(a)(2)(iv)		50.36(c)(2)			50.73(a)(2)(vii)	or in NRC Form 366A

**LICENSEE CONTACT FOR THIS LER (12)**

NAME <p style="text-align:center">Mark Ellington, Senior Analyst - Licensing</p>	TELEPHONE NUMBER (Include Area Code) <p style="text-align:center">(919) 362-2057</p>
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**COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)**

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

**SUPPLEMENTAL REPORT EXPECTED (14)**

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO	EXPECTED	MONTH	DAY	YEAR

On February 22, 2000, with the Harris Nuclear Plant (HNP) at 100% reactor power, a duct access panel for the Control Room Emergency Filtration System (CREFS) ventilation boundary was removed to facilitate surveillance testing of the charcoal in the filtration unit. This access panel is located at the common suction line for the two redundant CREFS units, R-2A and R-2B. During the time (approximately five minutes) that the access panel was removed and the test panel installed, the CREFS could not achieve and maintain a positive pressure as required by Technical Specifications (TS) surveillance requirement 4.7.6.d.3. This condition caused both of the CREFS units to become inoperable. Harris Nuclear Plant (HNP) TS do not provide an action when both CREFS are inoperable. Additionally, there is no action, in TS 3.7.6, for an inoperable CREFS ventilation boundary. Thus, opening the CREFS duct work during performance of the surveillance test required entry into TS 3.0.3.

**Cause of this event:** Inadequate review of plant procedures which affect control room ventilation boundaries.

**Corrective actions include:** (1) Reviewing plant procedures to ensure that passive barriers which may be opened do not violate CREFS pressure boundary requirements. (2) Install signs on applicable ventilation duct access panels instructing plant personnel to contact the main control room prior to removal of the associated duct access panel.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)	
Harris Nuclear Plant, Unit 1	05000400	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2	OF 2
		2000	-- 001	-- 00		

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

**I. DESCRIPTION OF EVENT**

On February 22, 2000, with the Harris Nuclear Plant (HNP) at 100% reactor power, a duct access panel for the Control Room Emergency Filtration System (CREFS) ventilation boundary was removed to facilitate surveillance testing of the charcoal in the filtration unit. This access panel is located at the common suction line for the two redundant CREFS units, R-2A and R-2B. During the time (approximately five minutes) that the access panel was removed and the test panel installed, the CREFS could not achieve and maintain a positive pressure as required by Technical Specifications (TS) surveillance requirement 4.7.6.d.3. This condition caused both of the CREFS units to become inoperable. Harris Nuclear Plant (HNP) TS do not provide an action when both CREFS are inoperable. Additionally, there is no action, in TS 3.7.6, for an inoperable CREFS ventilation boundary. Thus, opening the CREFS duct work during performance of the surveillance test required entry into TS 3.0.3.

The CREFS consists of two 100 percent capacity redundant fan and filter subsystems. Normally, the CREFS is in a standby alignment. During an accident, the normal outside air intake for the CREFS isolates and both emergency recirculation fans automatically start. Following verification of isolation of control room ventilation, an operator places one of the two emergency filtration units in standby. Next, the operator selects and opens one emergency outside air intake to pressurize the control room to 1/8 inwg. at less than or equal to 315 cfm flow. With the applicable access panel removed, operators would have been unable to pressurize the control room as required.

**II. CAUSE OF EVENT**

Inadequate review of plant procedures which affect control room ventilation boundaries.

**III. SAFETY SIGNIFICANCE**

There were no actual safety consequences as a result of this event. The individual performing the test could have replaced the access panel in a timely manner should the need arise. This report is being submitted pursuant to the criteria of 10CFR50.73(a)(2)(i) for Technical Specification Prohibited Operation or Condition.

**IV. CORRECTIVE ACTIONS**

- (1) Reviewing plant procedures to ensure that passive barriers which may be opened do not violate CREFS pressure boundary requirements.
- (2) Install signs on applicable ventilation duct access panels instructing plant personnel to contact the main control room prior to removal of the associated duct access panel.

**SIMILAR EVENTS**

HNP submitted LER 1999-08-00 to document that for during four refueling outages, main control room doors were being blocked open to facilitate testing. The corrective actions for that investigation did not consider breaching of ventilation boundaries other than doors. As a result, this issue was not identified during that investigation.