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SUBJECT: Special rept: on 920331, 0401, 02, 06, 14, 20, 24, 26, 29 & 30,
 listed fire doors & equipment exceeded LCOs during
 refueling activities. Inoperable equipment tracked by
 operations procedures to ensure proper operability.

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MAY 14 1992

Robinson File No.: 13510H

Serial: RNP/92-1403

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NO. 50-261

LICENSE NO. DPR-23

SPECIAL REPORT REGARDING INOPERABLE FIRE PROTECTION EQUIPMENT

Gentlemen:

Carolina Power and Light Company hereby provides this Special Report in accordance with H. B. Robinson Unit 2 Plant Technical Specifications. Specifically, Fire Protection equipment required by Technical Specifications 3.14.3.2, 3.14.5.2 and 3.14.7.2 exceeded their respective LCO's due to Refueling Outage activities.

On March 31, 1992, Fire Door No. 6, entrance to the South Cable Vault, was taken out of service in order to conduct required ILRT activities, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection System providing coverage for the fire areas on either side of the door was verified to be operable within one hour. Since the Fire Suppression System in the area was to be inhibited to facilitate work in the area, a Fire Watch was established to provide continuous coverage for Zone 10 (South Cable Vault area). The Fire Door was restored to operable status when work activities in the area were completed on April 14, 1992. This Fire Door was again taken out of service on April 18 at 0030 hours to facilitate Electrical Penetration modification activities. The Fire Watch remained in place because the CO2 System was taken out of service on April 1, 1992, as described below. The Fire Door will be returned to operable status upon completion of modification activities. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

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On April 1, 1992, the CO2 Fire Suppression System in Fire Zones 10, South Cable Vault, was taken out of service to conduct modification activities in the area, and a 14 day LCO was entered. A continuous Fire Watch was established in accordance with Technical Specification 3.14.5.2.a. The Fire Suppression System will be restored to operable status upon completion of the modification activities. This report is submitted pursuant to Technical Specification 3.14.7.2.b.

On April 2, 1992, the CO2 Fire Suppression System in Fire Zones 9, North Cable Vault, was taken out of service to conduct modification activities in the area, and a 14 day LCO was entered. Since the Fire Suppression System was inhibited, the Fire Watch established to provide continuous coverage for Zone 10 initiated roving coverage from the North to South Cable Vault areas through the Fire Door 8A, connecting the rooms. The Fire Suppression System will be restored to operable status upon completion of the modification activities. This report is submitted pursuant to Technical Specification 3.14.7.2.b.

On April 2, 1992 at 2152 hours, Fire Door No. 8A, between the North and South Cable Vaults, was taken out of service in order to conduct ILRT activities, and a 7 day LCO was entered. Since the Fire Suppression System in the area was inhibited, a Fire Watch was established to provide continuous coverage for Zone 9 and 10 in accordance with Technical Specification 3.14.7.2.b. The Fire Door was returned to service on April 14, 1992, at 1805 hours, which exceeded the LCO period. This report is submitted pursuant to Technical Specification 3.14.7.2.b.

On April 6, 1992, Fire Barrier Penetration Fire Seal MP-6436.00 FP, between Fire Zones 7 and 25 in the first level of the Reactor Auxiliary Building hallway, was taken out of service to inspect equipment in the area, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection and Suppression systems providing coverage for the fire areas on either side of the penetration were verified to be operable within one hour, and remain in service. The penetration was restored to operable status on May 7, 1992, at 1030 hours, exceeding the LCO period. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

On April 14, 1992 at 1935 hours, Fire Door No. 32, entrance to the Pipe Alley in the Reactor Auxiliary Building, was taken out of service in order to facilitate modification activities, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection System providing coverage for the fire areas on either side of the door was verified to be operable within one hour. The Fire Door will be restored to operable status when work activities in the area are completed. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

On April 14, 1992, at 2245 hours, Fire Door No. 8A, between the North and South Cable Vaults, was taken out of service in order to conduct electrical penetration modification activities, and a 7 day LCO was entered.

Since the Fire Suppression System in the area was inhibited to permit work in the area, a Fire Watch was established to provide continuous coverage for Zone 9 and 10 in accordance with Technical Specification 3.14.7.2.b. The Fire Door will be restored to operable status when work activities in the area are completed. This report is submitted pursuant to Technical Specification 3.14.7.2.b.

On April 24, 1992 at 0800 hours, Fire Door No. 20, entrance to the RHR Heat Exchanger hallway in the First Level of the Reactor Auxiliary Building, was taken out of service in order to facilitate modification activities in the RHR Heat Exchanger area, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection System providing coverage for the fire areas on either side of the door was verified to be operable within one hour. The Fire Door will be restored to operable status when work activities in the area are completed. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

On April 26, 1992 at 1440 hours, Fire Door No. 3, entrance from the Reactor Auxiliary Building Hallway into the CCW Pump Room, was taken out of service in order to facilitate modification activities, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection System providing coverage for the fire areas on either side of the door was verified to be operable within one hour. The Fire Door was restored to operable status when work activities in the area were completed on May 6, 1992, at 0815. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

On April 29, 1992 at 0150 hours, Fire Door No. 11, entrance to the Battery Room from the E1/E2 area in the second level of the Reactor Auxiliary Building, was taken out of service under a Special Procedure in order to supply temporary power to Battery Charger A1 or B1 from MCC-2, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection System providing coverage for the fire areas on either side of the door was verified to be operable within one hour. The Fire Suppression for the area was out of service at the time, and a continuous fire watch was established from April 29, 1992 until May 9, 1992, when the suppression system was returned to service. The Fire Door was restored to operable status at 1700 hours on May 10, 1992. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

On April 30, 1992 at 0105 hours, Fire Door No. 9, entrance to the first level of the Reactor Auxiliary Building from outside, was taken out of service and blocked open for electrical penetration modification activities, and a 7 day LCO was entered. In accordance with Technical Specification 3.14.7.2.a, the Fire Detection System providing coverage for the fire area was verified to be operable within one hour. The Fire Door will be restored to operable status when work activities in the area are completed. This report is submitted pursuant to Technical Specification 3.14.7.2.c.

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On April 20, 1992, at 1745 hours, the Fire Water Pre-Action System in Fire Zone 24, Containment Electrical Penetration Pre-Action System, was taken out of service to conduct modification activities in the area, and a 14 day LCO was entered. A once per shift inspection was established in accordance with Technical Specification 3.14.3.2.a. The Fire Water Pre-Action System will be restored to operable status upon completion of the modification activities. This report is submitted pursuant to Technical Specification 3.14.3.2.c.

Inoperable equipment is being tracked by Operations procedures which will ensure proper operability is achieved prior to plant start up.

Should you have any questions regarding this matter, please contact Mr. J. L. Harrison at (803) 383-1433.

Very truly yours,



R. H. Chambers

General Manager

Robinson Nuclear Project Department

RDC:sgk

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO