ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9207150280 DOC.DATE: 92/07/09 NOTARIZED: NO DOCKET #
FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
AUTH.NAME AUTHOR AFFILIATION
CHAMBERS,R.H. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Special rept:on 920619,RCS temp increased above 350 F w/both channels of CV high range RM administratively inoperable. Caused by TS which minimizes checks,calibrations & tests of monitors.Amend request issued 920605 identifying problem.

DISTRIBUTION CODE: IE22D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 2
TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD2-1 LA	1	1	PD2-1 PD	1	1
	MOZAFARI,B	1	1			
INTERNAL:	ACNW	2	2	AEOD/DOA	1	1
	AEOD/DSP/TPAB	1	1	AEOD/ROAB/DSP	2	2
	NRR/DET/EMEB 7E	1	1	NRR/DLPQ/LHFB10	1	1
	NRR/DLPQ/LPEB10	1	1	NRR/DOEA/OEAB	1	1
	NRR/DREP/PRPB11	2	2	NRR/DST/SELB 8D	1	1
	NRR/DST/SICB8H3	1	1	NRR/DST/SPLB8D1	1	1
	NRR/DST/SRXB 8E	1	1	REG FILE 02	1	1
	RES/DSIR/EIB	1	1	RGN2 FILE 01	1	1
EXTERNAL:	EG&G BRYCE,J.H	3	3	L ST LOBBY WARD	1	1
	NRC PDR	1	1	NSIC MURPHY,G.A	1	1
	NSIC POORE,W.	1	1	NUDOCS FULL TXT	1	1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 30 ENCL ~~30~~ 0

CP&L
Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
HARTSVILLE, SOUTH CAROLINA 29550

JUL 09 1992

Robinson File No.: 13510H

Serial: RNPD/92-1824

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

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
SPECIAL REPORT REGARDING CV HIGH RANGE RADIATION MONITORS

Gentlemen:

Carolina Power and Light Company (CP&L) hereby submits this Special Report in accordance with the action statement provided by Technical Specification (TS) Table 3.5-5, Item 8, "CV High Range Radiation Monitor," and associated Footnote 4. This TS requires that both channels of CV High Range Radiation Monitoring be operable when reactor coolant system (RCS) temperature is above 350 degrees F. If both channels cannot be restored to an operable status within seven days, a Special Report must be submitted within the following 14 days detailing the cause of the inoperable channel(s), the action being taken to restore the channel(s) to operable status, the estimated date for completion of repairs, and any compensatory action being taken while the channel(s) are inoperable.

On June 19, 1992, during unit heatup from refueling outage 14, RCS temperature was increased above 350 degrees F with both channels of CV High Range Radiation Monitoring administratively inoperable. The basis or reason for this condition is provided within TS Table 4.1-1, Item 44, which provides the minimum frequencies for checks, calibrations, and tests of the CV High Range Radiation Monitors. This surveillance requirement is annotated with a footnote which states, "Calibration performed in accordance with CP&L's letter dated April 28, 1982; S. R. Zimmerman to S. A. Varga." This footnote may be literally interpreted to only allow calibration of these monitors using the methodology provided within the 1982 correspondence. Under such conditions, there is apparently no latitude to allow calibration using the Special Calibration methodology provided within NUREG-0737, Item II.F.1, Attachment 3, and associated Table II.F.1-3, the original guidance documentation. A more thorough discussion of the background and safety significance of this issue has been previously provided within a Request for Waiver of Compliance, dated June 8, 1992, and a proposed License Amendment Request, dated June 5, 1992.

IE22
1/0

Existing surveillance test procedure, RST-020, "Verification of Electronic Calibration of Radiation Monitoring System Monitors R-32A&B," utilizes the NRC-approved calibration methodology provided within NUREG-0737. Therefore, these monitors have been properly tested and found to perform satisfactorily within their required range. However, since this surveillance test does not utilize the methodology provided within the footnote to Table 4.1-1, Item 44, these monitors have not met their literal TS surveillance requirements, and must remain administratively inoperable. It should be noted, however, that they remain available for monitoring and would be expected to perform satisfactorily, if needed, in their post-accident monitoring function.

As mentioned above, a License Amendment Request, dated June 5, 1992, has been submitted which would clearly identify the footnoted calibration information as an acceptable alternative to the NUREG-0737 methodology. Following approval and issuance of this Amendment Request, the CV High Range Radiation Monitors will be returned to an operable status. No physical changes or repairs to these monitors will be needed; the prior calibration performed using the NUREG-0737 methodology will be considered a proper surveillance test which will satisfy the amended requirements of TS Table 4.1-1, Item 44. No further compensatory or follow-up actions will be considered necessary.

Should you have any further questions regarding this matter, please do not hesitate to contact Mr. James L. Harrison at (803) 383-1433.

Very truly yours,

Rex H. Chambers

R. H. Chambers
General Manager
Robinson Nuclear Project Department

CTB:sgk

cc: Mr. S. D. Ebneter
Mr. L. W. Garner
Ms. B. L. Mozafari
INPO