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 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co 05000261  
 AUTH. NAME AUTHOR AFFILIATION  
 CROOK, D.R. Carolina Power & Light Co.  
 CHAMBERS, R.H. Carolina Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 93-002-00: on 930213, fire protection equipment removed from svc during fire protection sys surveillance test not returned to svc within allowed time by TS due to personnel error. Amend 142 to license implemented. W/930315 ltr.

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 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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RNP/93-0589  
(10CFR50.73)

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2  
DOCKET NO. 50-261  
LICENSE NO. DPR-23  
LICENSEE EVENT REPORT NO. 93-002-00

Gentlemen:

The enclosed Licensee Event Report (LER), is submitted in accordance with  
10 CFR 50.73 and NUREG 1022, Supplements No. 1 and 2.

Very truly yours,

R. H. Chambers  
General Manager

H. B. Robinson S. E. Plant

RDC:lst

Enclosure

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

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9303190170 930315  
PDR ADOCK 05000261  
S PDR

NRC FORM 366 (5-92)						U.S. NUCLEAR REGULATORY COMMISSION						APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95							
<b>LICENSEE EVENT REPORT (LER)</b>																			
(See reverse for required number of digits/characters for each block)																			
FACILITY NAME (1) <b>H. B. ROBINSON, UNIT NO. 2</b>												DOCKET NUMBER (2) <b>05000 261</b>				PAGE (3) <b>1 OF 3</b>			
TITLE (4) <b>INFORMATION REPORT: EXCEEDING FIRE PROTECTION SYSTEM ACTION STATEMENT</b>																			
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										
02	13	93	93	-- 002 --	00	03	15	93	FACILITY NAME										
									DOCKET NUMBER <b>05000</b>										
									DOCKET NUMBER <b>05000</b>										
OPERATING MODE (9)		N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)															
POWER LEVEL (10)		100		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)			
				20.405(a)(1)(i)				50.36(c)(1)				50.73(a)(2)(v)				73.71(c)			
				20.405(a)(1)(ii)				50.36(c)(2)				50.73(a)(2)(vii)				X OTHER			
				20.405(a)(1)(iii)				50.73(a)(2)(i)				50.73(a)(2)(viii)(A)				(Specify in Abstract below and in Text, NRC Form 366A)			
				20.405(a)(1)(iv)				50.73(a)(2)(ii)				50.73(a)(2)(viii)(B)							
				20.405(a)(1)(v)				50.73(a)(2)(iii)				50.73(a)(2)(x)							
LICENSEE CONTACT FOR THIS LER (12)																			
NAME <b>DAVID R. CROOK, SENIOR SPECIALIST-COMPLIANCE</b>												TELEPHONE NUMBER (Include Area Code) <b>(803) 383-1179</b>							
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																			
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS									
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH		DAY		YEAR	
YES (If yes, complete EXPECTED SUBMISSION DATE).												X NO							
<b>ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)</b>																			
<p>On February 13, 1993, with H. B. Robinson Unit No. 2 operating at one hundred percent power, a scheduled Fire Protection System surveillance test was being performed which removed certain Fire Protection equipment from service. Due to personnel error, the equipment was not returned to service within the time allowed by the Technical Specification (TS) Limiting Condition of Operation (LCO), and the compensatory actions required by TS 3.14.6.1 were not in place. Upon discovery, the Shift Supervisor entered TS 3.0 based on the action statement of the TS that had been exceeded, and notified the NRC Operations Center as such.</p> <p>At the time of this event, CP&amp;L had been authorized to relocate Fire Protection Technical Specifications to the FSAR pursuant to Amendment 142 to the H. B. Robinson Operating License, and a 90-day period for implementation of this amendment was in affect. Although procedures were not yet in place to reflect the amendment, the amendment was effective immediately upon issuance (December 7, 1992). As such, the reporting requirements of 10 CFR 50.73 do not apply.</p> <p>This report is provided as information to followup the immediate notification made to the NRC Operations Center on February 13, 1993.</p>																			

NRC FORM 366A  
(5-92)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104  
EXPIRES 5/31/95LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)			PAGE (3)
H. B. ROBINSON, UNIT NO. 2		05000-261		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
				93	-- 002 --	00	

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

I. DESCRIPTION OF EVENT

On February 13, 1993, H. B. Robinson Unit No. 2 was operating at one hundred percent power. At 0243 hours, during performance of a scheduled Fire Protection System surveillance test, the Halon Fire Suppression System for Zone 19 (Cable Spread Room) and Zone 20 (E-1/E-2 and Safeguards Equipment Room) was removed from service. During performance of the test, a procedural question was raised, and the test was stopped. The licensee Shift Supervisor requested that the Fire Suppression System for Zones 19 and 20 be placed back in service until the procedural question could be resolved. However, the system was not returned to service until 0345 hours, which exceeded the requirements of Technical Specification 3.14.6.1 to align the system to automatic initiation within sixty (60) minutes, or post a continuous fire watch. Upon discovery, the Shift Supervisor considered that Technical Specification 3.0 was applicable from 0343 hours until 0345 hours, based on the action statement of the Technical Specification that had been exceeded when the Fire Suppression System was not properly aligned. The NRC was notified via the ENS at 0443 hours of the entry into Technical Specification 3.0.

II. CAUSE OF EVENT

This event was due to personnel error. The licensee Fire Protection Technical Aide responsible for returning the system to service was not aware of the urgency to return the system to service to meet the LCO requirements.

III. ANALYSIS OF EVENT

On December 7, 1992, the NRC issued Amendment 142 to the H. B. Robinson Facility Operating License DPR-23. This amendment relocated the Fire Protection Technical Specifications to plant procedures and the Final Safety Analysis Report in accordance with the guidance provided by Generic Letters 86-10 and 88-12. The NRC Safety Evaluation issued with this amendment stated that the "amendment is effective as of the date of its issuance and shall be implemented within 90 days".

NRC FORM 366A  
(5-92)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY: OMB NO. 3150-0104  
EXPIRES 5/31/95**LICENSEE EVENT REPORT (LER)**  
**TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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H. B. ROBINSON, UNIT NO. 2	05000-261	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		93	-- 002 --	00	

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

**III. ANALYSIS OF EVENT (Continued)**

Upon issuance of License Amendment 142, administrative processes were initiated to complete the procedure changes necessary to relocate the Fire Protection Technical Specifications. On February 13, the appropriate changes had not been made to Operations procedures to delete the LCO requirements for Fire Protection equipment. As such, License Amendment 142, although effective, was not procedurally implemented, and the copy of the Technical Specifications in the Control Room had not been updated. The licensee Shift Supervisor followed existing procedures and entered Technical Specification 3.0 when the action statement of the Fire Protection Technical Specification was discovered to have been exceeded.

Entry into Technical Specification 3.0 is considered to be reportable pursuant to 10 CFR 50.73(a)(2)(ii) as a condition prohibited by the plant's Technical Specifications. At the time of this event, Fire Protection Technical Specifications had been removed and relocated to the FSAR. As such, the reporting requirements of 10 CFR 50.73 do not apply. Therefore, this report is submitted as information to followup the immediate notification made to the NRC Operations Center on February 13, 1993.

**IV. CORRECTIVE ACTIONS**

Amendment 142 to the H. B. Robinson Operating License was implemented on March 7, 1993, and the copy of the Technical Specifications located in the Control Room was updated. Plant procedures FP-012 and FP-013 provide the actions required for Fire Protection equipment.

**V. ADDITIONAL INFORMATION****A. Previous Similar Events**

None

**B. Component Failures**

None