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 AUTH. NAME AUTHOR AFFILIATION
 STIRLING, R. E. Carolina Power & Light Co.
 PEARSON, M. P. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 93-014-00: on 931015, identified two engineering surveillance tests performed outside TS required interval. Caused by personnel errors & inadequate work controls. Personnel counseled & surveillance reviewed. W/931115 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
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NOV 15 1993

Robinson File No: 13510C
Serial: RNP/93-2813
(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. 93-014-00

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,

M. P. Pearson
Marc P. Pearson
General Manager

RES:lst

Enclosure

c: Mr. S. D. Ebnetter
Mr. W. T. Orders
INPO

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NRC FORM 366
(5-92)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

LICENSEE EVENT REPORT (LER)

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

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) H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
H. B. ROBINSON, UNIT NO. 2DOCKET NUMBER (2)
05000 261PAGE (3)
1 OF 4

TITLE (4)

SURVEILLANCE TESTS EXCEEDED TECHNICAL SPECIFICATION TEST INTERVALS

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
10	15	93	93	-- 014 --	00	11	15	93	FACILITY NAME	DOCKET NUMBER 05000
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		0	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)		OTHER	
			20.405(a)(1)(iii)		X 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
RICHARD E. STIRLING, SR. SPECIALISTTELEPHONE NUMBER (Include Area Code)
(803) 383-1336

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)

YES (If yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On October 15, 1993, with H. B. Robinson Unit No. 2 in a refueling outage, a Nuclear Assessment Department audit determined that two Engineering Surveillance Tests (ESTs) were performed outside their Technical Specification-required interval. Contrary to the requirement to complete the surveillance test within a six (6) month frequency +/- 25% (184 +/- 46 days), EST-010 was separated by 239 days versus the allowed 230 days. In addition, EST-002 was performed on June 18, 1993, and again on July 30, 1993, separating the testing periods by forty-two (42) days versus the allowed thirty-eight (38) days. Further investigation by Technical Support revealed that an additional surveillance test had been performed outside the required interval.

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

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	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
		93	-- 014 --	00	

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

I. DESCRIPTION OF EVENT

On October 15, 1993, with H. B. Robinson Unit No. 2 in a refueling outage, a Nuclear Assessment Department audit determined that two Engineering Surveillance Tests (ESTs) had been performed outside their Technical Specification-required interval. Further investigation by Technical Support revealed that an additional surveillance test had been performed outside the required interval. This event is reportable pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

II. CAUSE OF EVENT

The cause of this Technical Specification violation is attributable to personnel errors and inadequate work controls.

There are four fundamental causes for the missed and late surveillances:

1. The data base and work process used by Technical Support do not automatically reset scheduled due dates for ESTs if the ESTs are performed early. Instead, the system depends on the responsible engineer to notify the Technical Support Surveillance Coordinator (TSSC) to reset the due date. If the responsible engineer forgets to do this or the TSSC fails to do it when asked, the scheduled due date may be outside the required calendar interval plus 25%, as required by Technical Specifications. If the responsible engineer does not remember the exact date the test was last performed, this sets up the possibility of the following test being performed outside the required interval.
2. The Technical Support Guideline TSG-116, "Technical Support Surveillance Control," requires no review of the completed surveillance schedule by management, making the process solely dependent on the responsible engineer and the EST Coordinator.
3. Technical Support management did not keep track of the EST completion dates, depending solely on the EST Coordinator, the responsible engineer, and the data base to ensure the ESTs were all performed on time. The responsible engineers, though aware of their responsibilities for on-time test completion per TSG-116, did not adequately keep track of dates the tests were accomplished, depending instead on the data base to provide them the correct due dates.

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4. The TSSC, though entering the completion dates in a schedule printout, did not pursue discrepancies evident from this task. TSG-116 requires the TSSC to monitor completion of scheduled ESTs and to notify the responsible engineer and management of uncompleted ESTs. This did not uniformly occur.

III. ANALYSIS OF EVENT

Three Engineering Surveillance Tests (ESTs) required by Technical Specifications were performed outside of their required testing intervals. These tests were:

EST-010, "Containment Personnel Airlock Leakage Test," performed April 26, 1992, and again on December 21, 1992. Required interval: 230 days. Actual interval: 239 days.

EST-002, "Nuclear Instrumentation System Power Range Axial Offset Calibration," performed June 18, 1993, and again on July 30, 1993. Required interval: thirty-eight (38) days. Actual interval: forty-two (42) days.

EST-002, performed July 30, 1993 and again on September 7, 1993. Required interval: thirty-eight (38) days. Actual interval: thirty-nine (39) days.

Investigation by Technical Support management revealed that in the first two cases above, the test was performed early one time, and the data base was not updated to move the following due date closer. The responsible engineers depended on the schedule, so they assumed time was available which in fact was not available. It could not be determined whether the responsible engineers failed to ask the TSSC to update the due dates, or whether the TSSC did not update the due dates after being asked to do so. No written record is required to be kept of the request.

In the third case, the data was taken during the required interval, but the procedure was not fully evaluated and signed off until too late. The responsible engineer stated that he had probably had a mind-set that the test was done when the data was taken and the data analyzed by the cognizant offsite organization.

Also, the completed monthly EST schedule is not required to be reviewed by management, so no cross-check occurred that might have detected the problem in time to correct it.

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There is no safety significance to the late ESTs. In the case of EST-002, the tests were performed just four days and one day late, respectively, and the late tests were both performed satisfactorily (i.e. all peaking factors were within Technical Specification Limits). Additionally, EST-002 requires target axial flux difference bands to be adjusted. Review of operation during the period revealed no operation outside the required bands had the bands been adjusted as required by EST-002. In the case of EST-010, the test was performed just nine days beyond the required interval. Although problems were experienced during the December 1992, test with inner seal leakage, the outer seal did not leak during this test, so containment integrity was not jeopardized by the late performance of EST-010.

IV. CORRECTIVE ACTIONS

IMMEDIATE CORRECTIVE ACTIONS

1. The Manager - Technical Support, counseled the involved subunit managers, the involved responsible engineers, and the TSSC on the significance and unacceptability of missing required EST due dates.
2. The EST schedule was reviewed for other ESTs possibly missed or performed late during Cycle 15. Three additional surveillance tests, although not required by Technical Specifications, were identified as having missed their testing interval.

PROPOSED CORRECTIVE ACTIONS

1. TSG-116 and the EST data base will be revised, as determined necessary by Technical Support, to redefine Technical Support management, TSSC and System Engineer responsibilities relative to the control and monitoring of surveillance test performance.
2. Training will be provided to all Technical Support personnel involved in ESTs to provide an understanding of their responsibilities for ensuring ESTs are performed on time or exceptions properly documented.

V. ADDITIONAL INFORMATION

Previous Similar Events:

LER 88-013 Surveillance Test Exceeded Technical Specification Test Interval.