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ACCESSION NBR:9406200170 DOC.DATE: 94/06/15 NOTARIZED: NO DOCKET #
 FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH.NAME AUTHOR AFFILIATION
 JURY,K.R. Carolina Power & Light Co.
 HERRELL,M.E. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-011-00:on 940516,17,18,19,25,0607 & 0608,Tec Specs
 3.0,EDG inoperability occurred.Caused by condition
 prohibited by TS.EDGs restored.W/940613 ltr.

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

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	RGN2 FILE 01	1 1		
EXTERNAL:	EG&G BRYCE,J.H	2 2	L ST LOBBY WARD	1 1
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404



10 CFR 50.73

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29550

Robinson File No.: 13510C
Serial: RNP/94-1206

JUN 13 1994

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
LICENSEE EVENT REPORT NO. 94-011-00

Gentlemen:

The enclosed Licensee Event Report (LER), is submitted in accordance with
10 CFR 50.73.

Very truly yours,

M. E. Herrell
Acting Plant General Manager

ALG:sgk
Enclosure

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

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PDR ADDCK 05000261
S PDR

Highway 151 and SC 23 Hartsville SC

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)										
FACILITY NAME (1) H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2						DOCKET NUMBER (2) 050-261		PAGE (3) 1 OF 3		
TITLE (4) TECHNICAL SPECIFICATIONS 3.0: EMERGENCY DIESEL GENERATOR INOPERABILITY										
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
05	16	94	94	-- 011 --	00	06	15	94	FACILITY NAME	DOCKET NUMBER
										05000
										05000
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)	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 K. R. Jury: Manager - Licensing/Regulatory Prog.								TELEPHONE NUMBER (Include Area Code) (803) 383-1363		
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				
ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16) On May 16, 17, 18, 19, and 25, 1994, and on June 7, 1994 and June 8, 1994, with the H. B. Robinson Steam Electric Plant (HBRSEP) Unit 2, operating at 100% power, the "A" Emergency Diesel Generator (EDG) was out of service for maintenance. In accordance with Technical Specification (TS) Action 3.7.2(d), the "B" EDG was tested daily during these periods to ensure operability. Performance of the Operations Surveillance Test (OST) results in an EDG being inoperable during portions of the testing. As a result, both EDGs were inoperable for approximately two and one half hours on each day that the test was performed, placing the plant in a condition outside of TS Limiting Condition for Operation 3.7. Therefore, TS Section 3.0 was entered for the duration of each test period. The basis of this situation is that since the action required by TS 3.7.2(d) cannot be met without placing the plant into a condition for which there is not an action statement, a condition prohibited by TS results. This situation had minimal effect on plant safety. During each time that the "B" EDG was inoperable, off-site power was available and operators were located at the EDG with the ability to manually place the "B" EDG in service should off-site power have been lost. This report is submitted pursuant to 10 CFR 50.73 (a)(2)(i)(B) as operation in condition prohibited by TS.										

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95		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.									
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION															
FACILITY NAME (1)				DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)							
H. B. ROBINSON, UNIT 2				050-261		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">YEAR</td> <td style="width: 33%;">SEQUENTIAL NUMBER</td> <td style="width: 33%;">REVISION NUMBER</td> </tr> <tr> <td style="text-align: center;">94</td> <td style="text-align: center;">011</td> <td style="text-align: center;">00</td> </tr> </table>		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	94	011	00	2 OF 3	
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER													
94	011	00													

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

I. DESCRIPTION OF EVENT

On May 16, 17, 18, 19, and 25, 1994, and on June 7, 1994 and June 8, 1994, with the H. B. Robinson Steam Electric Plant (HBRSEP) Unit 2, operating at 100% power, the "A" Emergency Diesel Generator (EDG) (EIIS Code: EK) was out of service for maintenance. In accordance with Technical Specification (TS) Section, 3.7.2 (d), "power operation may continue for seven days if one diesel generator is inoperable provided the remaining diesel generator is tested daily to ensure operability and the engineered safety features associated with this diesel generator shall be operable." The "B" EDG was tested daily during these periods in accordance with Operations Surveillance Test (OST) Procedure OST-409, "Emergency Diesels (Rapid Speed Start)," for a period of approximately two and one-half hours daily. The test procedure requires that the "B" EDG "Parallel/Isolate Switch" be placed in the "Parallel" position and the EDG be barred over. An EDG is declared inoperable prior to any step in the test procedure that places the "Parallel/Isolate Switch" to "Parallel," or bars the EDG over since these conditions prevent the "B" EDG from providing adequate voltage support to required loads and from starting automatically in response to a low voltage signal on the Emergency (i.e., E1 or E2) Bus (EIIS Code: BU). As a result, both EDGs were inoperable for the approximately two and one half hours on each of the above dates placing the reactor outside of TS Limiting Condition for Operation 3.7. Accordingly, TS Section 3.0 was entered for the duration of each test period.

This report is submitted pursuant to 10 CFR 50.73 (a)(2)(i)(B) as operation in a condition prohibited by TS.

II. CAUSE OF EVENT

The cause of the situation was that since one EDG was out of service due to maintenance, the action required by TS 3.7.2(d) could not be met without placing the plant into a condition for which there is not an applicable action statement, resulting in a condition prohibited by TS.

TS Section 3.7.2(d) states that one EDG may remain inoperable for a period of seven days provided that the other EDG is tested daily. Due to the system configuration necessary to conduct the test, the EDG that was being tested was declared inoperable based upon the definition of operability as defined in TS Section 1.3. One of the functions of the EDG is to start automatically upon low voltage on the emergency bus and provide power to required loads. When the EDG "Parallel/Isolate Switch" is placed in the "Parallel" position, the EDG cannot provide adequate voltage support to required loads. When the EDG is barred over, the EDG cannot start automatically. As a result, during these configurations, the EDG being tested was declared inoperable.

Previous interpretations of TS Section 3.7.2(d) assumed that the requirement to test the operable EDG allowed the actions necessary to perform the test, including those actions which would prevent automatic starting of the tested EDG, without being in a condition prohibited by TS. A recent re-interpretation of TS Sections 1.3 and 3.7.2(d) was applied to the performance of the TS required EDG tests in this situation, and as a result, a condition prohibited by TS was determined to exist.

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 2		YEAR	SEQUENTIAL	REVISION	
	050-261	94	011	00	3 OF 3

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

III. ANALYSIS OF EVENT

During the time that the "B" EDG was being tested and therefore declared inoperable, off-site power was available and operators were located at the EDG with the ability to manually place "B" EDG in service to provide power to required equipment should off-site power be lost. Also, during the time that the "A" EDG was undergoing maintenance, the "A" EDG could have been restored to operable status within 12 hours.

IV. CORRECTIVE ACTIONS

The "B" EDG was restored to operable status upon completion of each test, approximately two and one half hours after it was declared inoperable. The "A" EDG was restored to operable status at 0758 on May 19, 1994, at 0505 on May 26, 1994, and at 0330 on June 9, 1994. A TS change request will be prepared by July 1, 1994.

V. ADDITIONAL INFORMATION

A. Component Failures

None

B. Previous Similar Events

None