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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.
YOUNG,D.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-020-00:on 940831,determination was made that a condition existed that was outside design basis.Caused by personnel error.SCO that signed for all fifteen valves being closed has been counselled.W/940930 ltr.

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PRIORITY 1 DOCUMENT

CP&L

10 CFR 50.73

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

Robinson File No.: 13510C
Serial: RNP/94-1723
SEP 26 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. 94-020-00

Gentlemen:

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

Very truly yours,

Dale E Young

D. E. Young
Plant General Manager

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

IE22
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Enclosure to Serial: RNP/94-1723

NRC FORM 366 (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)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2	050-261	1 OF 4

TITLE (4) **CONDITION OUTSIDE DESIGN BASIS DUE TO MISPOSITIONED VALVES**

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
08	31	94	94	-- 020 --	00	09	30	94		05000
									FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	N
POWER LEVEL (10)	100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

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)	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)	X 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	TELEPHONE NUMBER (Include Area Code)
K. R. Jury: Manager - Licensing/Regulatory Prog.	(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
X YES (If yes, complete EXPECTED SUBMISSION DATE).	NO		12	05	94

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

On August 31, 1994, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was operating at 100% power. Following review of a report of main steam line drain line root isolation valves being in the "open" position, an initial determination was made that a condition existed that was outside the design basis of the plant, since these valves are considered to be containment isolation valves. Technical Specifications (TS) 1.7 and 3.6 collectively require that these valves be closed during normal operation. Although manual valves in the lines downstream of these containment isolation valves were closed, the evaluation initially determined that these closed valves are located on a portion of the line which is not seismically qualified. This event was caused by personnel error. An operator error during plant startup activities resulted in the valves not being returned to their closed position. Upon discovery of this condition, the mispositioned valves were placed in the closed position. The operator involved with the valves' misposition was counselled. The safety significance of operating the Unit during the period of time that the valves were in the open position is currently being evaluated. This report is submitted pursuant to 10 CFR 50.73 (a)(2)(i) as a condition prohibited by TS.

NRC FORM 366A (5-92) U.S. NUCLEAR REGULATORY COMMISSION

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

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

I. DESCRIPTION OF EVENT

On August 31, 1994, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was operating at 100% power. At 0805 hours, following review of a report of main steam (EIIS Code: SB) line drain line root isolation valves (EIIS Code: ISV) being in the "open" position, an initial determination was made that a condition existed that was outside the design basis of the plant. Specifically, on August 29, 1994, a Senior Control Operator (SCO) performing Job Performance Measures (JPMs) discovered six manual containment isolation valves in the one inch lines used for isolation of the drains for each Main Steam Isolation Valve (MSIV) (EIIS Code: ISV) to be in the "open" position.

The NRC was notified of this condition via the Emergency Notification System (ENS) on August 31, 1994 at 0856 hours pursuant to 10 CFR 50.72(b)(1)(ii)(B) as a condition outside the design basis of the plant.

II. CAUSE OF EVENT

This event was caused by personnel error. The results of the investigation revealed that a total of fifteen main steam line drain line root isolation valves, normally referred to as "above and below seat drain valves," had been manipulated when the reactor was in hot shutdown. On August 6, 1994, six of these valves were to be closed to establish containment integrity during the performance of procedure GP-005, "Power Operation." Prior to that time, with the reactor in the hot shutdown condition and the MSIVs closed, the MSIV drain line root isolation valves had been throttled open, as authorized by procedure GP-002, "Cold Shutdown to Hot Subcritical at No Load Tavg," to allow for Reactor Coolant System (RCS) temperature control. To achieve temperature control, the root isolation valve for the two MSIV drain lines for each MSIV must be opened, one additional valve for each MSIV downstream of one of the root valves must be opened, and finally the downstream isolation for the root valves are throttled, by the direction of the control room. Adjusting temperature in this manner is routinely directed by a licensed Reactor Operator (RO) in the control room via communication to an Auxiliary Operator (AO) in the field.

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

II. CAUSE OF EVENT (Continued)

A breakdown in communication and improper work practices during plant startup activities resulted in nine of the valves not being returned to their closed position. On August 6, 1994, during performance of GP-005, the SCO in the control room directed an SCO in the field to isolate the MSIV drain line valves. The SCO in the field was not made aware that this direction was specifically for performance of plant startup activities in accordance with GP-005. Therefore, under the impression that the valves were being manipulated for RCS temperature control only, the SCO in the field, in turn, directed two AOs to complete this task while he observed. Because the other nine root isolation valves, including the six containment isolation valves, are normally open when using the above and below seat drains for temperature control, these valves were not closed. Subsequently, the SCO who had been in the field improperly documented on the official copy of procedure GP-005 that all fifteen of the valves had been verified closed, when in fact, the six isolation valves had not been returned to the closed position as required.

III. ANALYSIS OF EVENT

Technical Specifications (TS) 3.6 requires that the containment integrity shall not be violated unless the reactor is in the cold shutdown condition. As defined in part, by TS 1.7, containment integrity is considered to exist when all non-automatic containment isolation valves not required for normal operation are closed and blind flanges are properly installed where required. The basis of TS 3.6 states that the RCS must be in the conditions of cold shutdown in order to relax containment integrity. This ensures that the release of radioactive materials from the containment atmosphere will limit the site boundary radiation doses to within the dose guidelines values of 10 CFR 100 during accident conditions. The main steam line drain line root isolation valves serve to provide a barrier within the containment boundary, and are required to be under administrative control whenever containment integrity is required. Therefore, since the valves are "non-automatic containment isolation valves not required for normal operation" and are required for containment isolation, the requirements of TS 3.6 were not met.

An analysis is being performed of whether or not operating with the affected valves in the open position constitutes a condition outside the design basis of the plant. In addition, we are evaluating the licensing basis for these valves. A supplement to this LER will be provided to report the conclusions of these efforts.

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

III. ANALYSIS OF EVENT (Continued)

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

IV. CORRECTIVE ACTIONS

Upon discovery of this condition, the mispositioned valves were placed in the closed position. A safety analysis was completed to determine that the current containment isolation configuration regarding manually closed isolation valves meets license requirements and license bases documentation.

Expectations for documenting equipment manipulations conducted in the field have been reinforced. The SCO that signed for all fifteen valves being closed has been counselled.

An evaluation of temperature control practices during hot shutdown conditions will be conducted to ensure plant configuration is appropriately maintained. Procedures will be revised to provide an appropriate temperature band and instructions on how to maintain temperature with the MSIVs closed.

An evaluation of the effect of using MSIV drain line root isolation valves and associated piping for long periods of RCS temperature control will be conducted to verify the components being used remain within design parameters.

V. ADDITIONAL INFORMATION

A. Component Failures

None

B. Previous Similar Events

The following Licensee Event Reports (LERs) reported valve misposition events:

LER 87-013
LER 87-015