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 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light Co 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 94-015-01: on 940927, TS 3.0 violation occurred re two
 EDG out of svc. Caused by action required by TS Section
 3.7.2(d). EDG restored to operable status. W/941027 ltr.

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10 CFR 50.73

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

Robinson File No.: 13510C
Serial: RNP/94-1829

OCT 27 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. 94-015-01

Gentlemen:

The enclosed supplemental Licensee Event Report (LER), is submitted in accordance with 10 CFR 50.73. This supplement provides a compilation of information concerning 1994 Emergency Diesel Generator test program events. New information is provided in the table included in this supplement.

Very truly yours,


D. E. Young
Plant General Manager

RDC:rdc
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

9411030185 941027
PDR ADOCK 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)

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

DOCKET NUMBER (2)

050-261

PAGE (3)

1 OF 5

TITLE (4) TECHNICAL SPECIFICATION 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
09	27	94	94	-- 015 --	01	10	27	94	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)		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 Programs

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)

YES

(If yes, complete EXPECTED SUBMISSION DATE).

X

NO

EXPECTED
SUBMISSION
DATE (15)

MONTH

DAY

YEAR

This supplement provides a compilation of information concerning 1994 Emergency Diesel Generator test program events which required entry into Technical Specification (TS) Section 3.0. On several occasions during 1994, with the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 operating at 100% power, one of the two Emergency Diesel Generators (EDGs) was removed from service for scheduled maintenance. In accordance with TS Action 3.7.2(d), the redundant EDG was tested daily during the respective maintenance period to ensure operability. Performance of portions of this test results in the tested EDG being rendered inoperable. However, the action required by TS Section 3.7.2(d) cannot be met without placing the plant in a condition for which there is not a compensatory Action Statement. As a result, both EDGs were inoperable for approximately three hours on the days that the TS required test was performed, placing the plant in a condition outside the TS Limiting Condition for Operation 3.7. Therefore, TS Section 3.0 was entered for the duration of each testing period. During each time that both EDGs were inoperable, off-site power was available and operators were located at the EDG being tested with the ability to manually place the 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 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

LICENSEE EVENT REPORT (LER)

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	050-261	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 5
		94	015	01	

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

I. DESCRIPTION OF EVENT

This supplemental Licensee Event Report (LER) provides a compilation of information concerning 1994 Emergency Diesel Generator (EDG) testing which required entry into Technical Specifications (TS) Section 3.0.

On each of the dates provided in the table included in this LER, one of the two EDGs (EIIS Code: EK) was out of service for scheduled maintenance, and the redundant EDG was concurrently tested as required by TS Section 3.7, rendering both EDGs inoperable for approximately three hours of each test period. This testing occurred with the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 operating at 100 percent power. The test configuration placed the unit outside of TS Limiting Condition for Operation (LCO) 3.7, and TS Section 3.0 was entered accordingly for the duration of each test period.

In accordance with 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 redundant EDG was tested daily during this period in accordance with Operations Surveillance Test (OST) Procedure OST-409, "Emergency Diesels (Rapid Speed Start)," for a period of approximately three hours. The test procedure requires that the redundant 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 EDG being tested 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 approximately three hours on each of the dates provided in the enclosed table, placing the unit outside of TS LCO 3.7. Accordingly, TS Section 3.0 was entered for the duration of each test period.

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	050-261	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 5
		94	015	01	

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

II. CAUSE OF EVENT

The cause of these conditions was the Action required by TS Section 3.7.2(d). Since one EDG was out of service for scheduled maintenance, TS Section 3.7.2(d) could not be met without placing the plant in 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 tested EDG must be 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 resulting in both of the EDGs being inoperable.

III. ANALYSIS OF EVENT

During each period that an 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 the EDG being tested in service to provide power to required equipment should off-site power be lost. Also, during the time that planned maintenance was being performed on one EDG, the tested EDG could have been restored to operable status within two hours.

This report is submitted pursuant to 10 CFR 50.73 (a)(2)(i)(B) as operation in 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							
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.							
FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)							
H. B. ROBINSON, UNIT NO. 2		050-261		<table border="1"> <tr> <td>YEAR</td> <td>SEQUENTIAL NUMBER</td> <td>REVISION NUMBER</td> </tr> <tr> <td>94</td> <td>015</td> <td>01</td> </tr> </table>		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	94	015	01
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER									
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

IV. CORRECTIVE ACTIONS

The EDG was restored to operable status upon completion of each test. The redundant, inoperable EDG was restored to operable status following completion of the maintenance activity on the dates specified in the enclosed table.

A TS change request was submitted on July 29, 1994, to the NRC that eliminates, in most cases, the requirement to test the other EDG when one EDG is inoperable.

V. ADDITIONAL INFORMATION

A. Component Failures

None

B. Previous Similar Events

LER 94-011-01

LER 94-15

NRC FORM 366A
(5-92)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95LICENSEE EVENT REPORT (LER)
TEXT CONTINUATIONESTIMATED 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
(MNB 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)
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1994 EDG TESTING REQUIRING ENTRY INTO TS SECTION 3.0

EQUIPMENT BEING MAINTAINED

EQUIPMENT BEING TESTED

MAINTENANCE EDG	DATE/TIME INOPERABLE	DATE/TIME OPERABLE	TOTAL TIME INOPERABLE	TESTED EDG	DATE/TIME INOPERABLE	DATE/TIME OPERABLE	TOTAL TIME INOPERABLE**
EDG-A	05/16/94 0518	05/19/94 0758	74.67 Hours	EDG-B	05/17/94* 0008	05/17/94 0248	2.67 Hours
				EDG-B	05/18/94* 0006	05/18/94 0235	2.48 Hours
				EDG-B	05/19/94* 0012	05/19/94 0240	2.47 Hours
EDG-A	05/25/94 0038	05/26/94 0508	28.50 Hours	EDG-B	05/25/94* 2027	05/25/94 2320	2.88 Hours
EDG-A	06/06/94 0502	06/09/94 0330	70.47 Hours	EDG-B	06/07/94* 0052	06/07/94 0425	3.55 Hours
				EDG-B	06/08/94* 0034	06/08/94 0330	2.93 Hours
EDG-B	06/20/94 0500 Hours	06/22/94 0442 Hours	47.70 Hours	EDG-A	06/21/94† 0047	06/21/94 0430	3.72 Hours
EDG-A	09/26/94 2330	09/30/94 0028 Hours	72.97 Hours	EDG-B	09/27/94‡ 1343	09/27/94 1827	4.73 Hours
				EDG-B	09/28/94‡ 1240	09/28/94 1629	3.82 Hours
				EDG-B	09/29/94‡ 1459	09/29/94 1735	2.60 Hours

* Reported by LER 94-011

† Reported by LER 94-015

‡ Reported by LER 94-015-01

** This represents the time in TS Section 3.0