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ACCESSION NBR:9503210150 DOC.DATE: 95/03/16 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.
YOUNG,D.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-001-00:on 950214,SI sys was declared inoperable to perform scheduled operations surveillance test.Caused by SI sys configuration required for check valve testing.Review of test configurations has been initiated.W/950316 ltr.

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PRIORITY 1 DOCUMENT

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10 CFR 50.73

Carolina Power & Light Company
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

Robinson File No.: 13510C
Serial: RNP-RA/95-0030

MAR 16 1995

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. 95-001-00

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

210097

IE22

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)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2	050-261	1 OF 3

TITLE (4) **SAFETY INJECTION PUMP TESTING REQUIRES TS 3.0 ENTRY**

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
02	14	95	95	-- 001 --	00	03	16	95		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)	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	TELEPHONE NUMBER (Include Area Code)
K. R. Jury: Manager - Licensing/Regulatory Programs	(803) 857-1363

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 February 14, 1994, with H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 operating at 100 percent power, the Safety Injection (SI) system was declared inoperable to perform a scheduled Operations Surveillance Test (OST) procedure. To accomplish a portion of the test, SI flow must be directed through the SI test line, which is not normally aligned for flow. Although specific confirming calculations have not been completed, this testing apparently places the SI system in a configuration where adequate flow to the reactor core cannot be assured during all design bases accidents. Since there are no Technical Specifications (TS) provisions for this test configuration, conducting this portion of the test places the system in a condition prohibited by the TS. Accordingly, TS Section 3.0, which requires that the unit be placed in hot shutdown within eight hours and in cold shutdown within the next thirty hours, was entered on three occasions between February 14, and 17, 1994, when the SI system was declared inoperable to accommodate this testing.

A review of the test configuration has been initiated to determine if the SI system is operable in this configuration. Whether the check valve testing frequency can be changed to allow testing on a Cold Shutdown interval is under investigation.

This report is submitted in accordance with 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

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)

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2	050-261	95	001	00	2 OF 3

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

I. DESCRIPTION OF EVENT

On February 14, 1994, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was operating at 100 percent power. At 0144 hours, the Safety Injection system (EIIS Code: BQ) was declared inoperable to perform portions of the scheduled Operations Surveillance Test (OST) procedure OST-151, "Safety Injection (SI) System Component Test." This test, which is performed in accordance with Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, and to satisfy the requirements Technical Specifications (TS) Section 4.0.1.a, is conducted on a quarterly basis to assure SI system components are capable of performing their required functions. This OST includes forward flow testing of valves SI-879A, B, and C (i.e., SI pump discharge check valves), and SI-839 (i.e., SI test line check valve) (EIIS Code: V). To accomplish this portion of the test, SI flow must be directed to the Refueling Water Storage Tank (RWST) (EIIS Code: TK) through the SI test line, which is not normally aligned for flow. Although specific confirming calculations have not been completed, with flow aligned to the RWST to perform check valve testing, the SI system is apparently in a configuration where adequate flow to the reactor core cannot be assured during all design bases accidents. Since there are no TS provisions for this test configuration, conducting this portion of the test places the system in a condition prohibited by the TS. Accordingly, TS Section 3.0, which requires that the unit be placed in hot shutdown within eight hours and in cold shutdown within the next thirty hours, was entered on three occasions between February 14, and 17, 1994, when the SI system was declared inoperable to accommodate this testing.

II. CAUSE OF EVENT

This condition is caused by an SI system configuration that is required for check valve testing, but results in the possibility for inadequate flow to the reactor core during a design basis accident.

Previous interpretations of TS assumed the requirement to test the SI system allowed the actions necessary to perform the required surveillance testing. Re-interpretation of these TS requirements and the testing configuration has resulted in the conclusion that the affects of this testing on overall system operability must be addressed as part of routine surveillance testing. As a result, a condition prohibited by TS was determined to exist while the system flowpath was aligned to accomplish the required check valve testing.

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

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2	050-261	95	001	00	3 OF 3

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

III. ANALYSIS OF EVENT

With flow aligned to the RWST to perform check valve testing, the SI system is potentially in a configuration where adequate flow to the reactor core cannot be assured during all design bases accidents. However, a continuous action step is provided within Procedure OST-151, directing the operator to take immediate action to isolate this flowpath if an SI actuation occurs while the system is out of its normal alignment. Although credit cannot be taken for the pump being tested, based on engineering judgement, adequate flow to the core would exist with an operable SI pump when the other pump is in the test configuration, if the pump being tested operates as designed upon receipt of an SI signal. Therefore, the safety significance of this configuration is considered to be minimal.

Since the SI system configuration that is established for required check valve testing does not have an action required by TS, this configuration is considered a condition prohibited by the TS; therefore, this report is submitted in accordance with 10 CFR 50.73(a)(2)(i)(B).

IV. CORRECTIVE ACTIONS

A review of the test configuration has been initiated to determine if the SI system is operable in this configuration.

Whether the check valve testing frequency can be changed under the applicable ASME B&PV Code requirements to allow testing on a Cold Shutdown interval is under investigation.

V. ADDITIONAL INFORMATION

A. Failed Component Information

None

B. Previous Similar Events

LER 94-018