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 AUTH.NAME AUTHOR AFFILIATION
 CROOK,R.D. Carolina Power & Light Co.
 MORGAN,R.E. Carolina Power & Light Co.
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 90-010-00:on 900620,inoperable fire barrier penetration seal.

W/9 ltr.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
LICENSEE EVENT REPORT 90-010

Gentlemen:

The enclosed Licensee Event Report (LER) is submitted in accordance with 10CFR50.73 and NUREG-1022, including supplements No. 1 and 2.

Very truly yours,

R. E. Morgan
General Manager
H. B. Robinson S. E. Plant

Enclosure

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
INPO

9007300080 900720
PDR ADDCK 05000261
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2										DOCKET NUMBER (2) 0 5 0 0 0 2 6 1				PAGE (3) 1 OF 4					
TITLE (4) INOPERABLE FIRE BARRIER PENETRATION SEAL																			
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 NAMES				DOCKET NUMBER(S)						
0	6	2	0	9	0	9	0	7	2	0	9	0	0	5	0	0	0		
OPERATING MODE (9) N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																	
POWER LEVEL (10) 0 6 0		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)					
		20.405(a)(1)(i)				50.38(c)(1)				50.73(a)(2)(v)				73.71(c)					
		20.405(a)(1)(ii)				50.38(c)(2)				50.73(a)(2)(vii)				OTHER (Specify in Abstract below and in Text, NRC Form 365A)					
		20.405(a)(1)(iii)				X 50.73(a)(2)(i)				50.73(a)(2)(viii)(A)									
		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 R. D. Crook, Senior Specialist - Regulatory Compliance										TELEPHONE NUMBER AREA CODE 8 0 3 3 8 3 - 1 1 7 9									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																			
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPD									
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR			
X YES (If yes, complete EXPECTED SUBMISSION DATE)												NO		0	1	3	1	9	1

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

On June 20, 1990, with H. B. Robinson Unit No. 2 operating at sixty percent power, a fire barrier penetration was discovered with no fire seal. The penetration was declared inoperable at 1605 hours on June 20, 1990. The penetration consisted of a six inch core bore in the ceiling of a fire zone to the outside roof. The penetration housed a four inch roof drain pipe, which was not sealed other than by the tar covering of the roof. The core bore was installed as part of a Plant modification during 1977, and apparently was not recognized to constitute a fire penetration at that time. The penetration was repaired and returned to service at 1850 hours on June 26, 1990. Since it can be established that this penetration had been inoperable for a time period which exceeded the requirements of the Technical Specifications, this Licensee Event Report is submitted pursuant to 10CFR50.73 (a)(2)(i)(B) as a condition prohibited by the Plant's Technical Specifications.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0164

EXPIRES: 8/31/88

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
H. B. ROBINSON, UNIT NO. 2	0 5 0 0 0 2 6 1	9 0	- 0 1 0	- 0 1 0	0 2	OF 0 4

TEXT (If more space is required, use additional NRC Form 368A's) (17)

I. DESCRIPTION OF EVENT

On June 20, 1990, Unit No. 2 was operating at sixty percent power with an inspection of fire barrier penetration seals in progress.¹ Specifically, 100% of the site fire barrier penetration seals were being inspected in accordance with OST-623, "Fire Barrier Penetration Seal Inspection", to satisfy the requirements of Technical Specification 4.14.5.1. As part of this inspection, a fire barrier penetration (MP-6240.00-FB-07/25) was discovered with no fire seal. This penetration consists of a six-inch core bore housing a four-inch roof drain pipe located in the ceiling over the A&B Gas Strippers in the Reactor Auxiliary Building to the outside roof. The penetration was declared inoperable at 1605 hours on June 20, 1990. Compensatory actions were taken in accordance with Technical Specification 3.14.7.2. The penetration was repaired and returned to service at 1815 hours on June 26, 1990, within the seven days of the declaration of inoperability as required by the Technical Specifications.

A review of documentation associated with the affected penetration showed that it had been installed between April of 1977 and July of 1978, when the "C" Waste Evaporator addition was constructed. Based on this documentation, sufficient justification exists to consider that the penetration had been inoperable in excess of the Limiting Condition for Operation (LCO) requirements, and compensatory actions were not implemented in accordance with Technical Specifications.

II. CAUSE OF EVENT

Plant Modification M-383 installed the "C" Waste Evaporator between April, 1977, and July, 1978. This modification located the six-inch core bore in the ceiling of the A&B Gas Stripper room to house a four-inch roof drain pipe. This core bore was not appropriately incorporated as a fire barrier penetration at that time, and was again not recognized when the data base was assembled in 1984, which was developed using modification penetration drawings as a basis. Thus, previous penetration inspections have failed to detect the existence of this unsealed fire barrier penetration. It should be noted that, prior to establishing the penetration data base in 1984, there were no formal controls associated with mechanical penetrations.

¹H. B. Robinson Unit No. 2 is a 700 MW pressurized water reactor in commercial operation since March, 1971.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-3164

EXPIRES: 8/31/86

FACILITY NAME (1) H. B. ROBINSON, UNIT NO. 2	DOCKET NUMBER (2) 0 5 0 0 0 2 6 1	LER NUMBER (8)			PAGE (3)	
		YEAR 9 0	SEQUENTIAL NUMBER 0 1 0	REVISION NUMBER 0 0	0 3 OF 0 4	

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

III. ANALYSIS OF EVENT

Fire barrier penetration seals are a passive element in the facility fire protection program. Their operability is intended to minimize the probability of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. Technical Specification 3.14.7.2.a ensures that the prompt detection capability exists in the vicinity of an inoperable fire barrier penetration by requiring verification of fire detection system operability within one hour of penetration inoperability. Should a fire zone detection system be inoperable, a continuous fire watch is established within one hour in accordance with Technical Specification 3.14.7.2.b. Therefore, proper contingency actions are taken until the penetration is restored to operable status.

Based on the determination that penetration MP-6240.00-FB-07/25 had been inoperable for a period of time which exceeded Technical Specification LCO requirements, this occurrence is reportable pursuant to 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the Plant's Technical Specifications.

IV. CORRECTIVE ACTION

Fire penetration MP-6240.00-FB-07/25 was properly sealed and returned to service at 1815 hours on June 20, 1990, which was within the seven days of declaration of the inoperability as required by the Technical Specifications.

The penetration drawings and data base are being revised to reflect this penetration.

As committed within Licensee Event Report 90-003, H. B. Robinson personnel are currently performing an inspection of fire barrier penetrations in accordance with Technical Specification 4.14.5.1. This inspection will include 100% of the penetration seals and is intended to identify any further penetration deficiencies. The inspection is scheduled to be completed prior to startup from the 1990 refueling outage.

NRC Form 364A
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

FACILITY NAME (1) H. B. ROBINSON, UNIT NO. 2	DOCKET NUMBER (2) 0 5 0 0 0 2 6 1 9 0	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		0	1	0	0	0 4 OF 0 4

TEXT (If more space is required, use additional NRC Form 364A's) (17)

As stated in Licensee Event Report 90-008, since an inspection of this magnitude is expected to result in the discovery of additional penetration deficiencies, H. B. Robinson has initiated discussions with NRC personnel to determine the most efficient and effective method of reporting identified deficiencies. These discussions have focused on the objectives of the current inspection program, and how it is different than those inspections previously performed. While the current inspection will ensure operable fire barrier penetration seals in accordance with Technical Specifications, it will also provide an updated and accurate data base of fire barrier penetrations. This will be accomplished through field inspection, research into previous modifications, drawing updates, and data base completeness. In addition, CP&L's program for maintaining equipment data is being implemented such that fire penetration information is maintained up-to-date through the design change process. This process will preclude future inadvertent deletions of penetrations from inspection.

It has been the previous practice at H. B. Robinson to submit a Licensee Event Report for inoperable penetrations where it could be established that the penetration had been inoperable for greater than the limits required by Technical Specifications. This is consistent with the guidance provided by NUREG-1022, Supplement 1. However, for the reasons discussed above, H. B. Robinson does not intend to submit further Licensee Event Reports on inoperable penetrations found during the present inspection. If additional inoperable penetrations are detected, they will be reported in a supplement to this report within thirty days of completion of the inspection. This position has been discussed with NRC personnel.

V. ADDITIONAL INFORMATION

A. Failed Component Identification:

None.

B. Previous Similar Events:

LER-90-008
LER-90-003
LER-88-018-01