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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9108120222 DOC. DATE: 91/08/02 NOTARIZED: NO DOCKET #
 FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
 AUTH. NAME AUTHOR AFFILIATION
 CROOK, R.D. Carolina Power & Light Co.
 SHEPPARD, J.J. Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 91-008-00: on 910711, isolation valve seal water isolated from all containment penetrations. Caused by sys configuration during post-maint testing. Testing satisfactorily performed on WD-1722.W/910802 ltr.

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Carolina Power & Light Company

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
LICENSEE EVENT REPORT NO. 91-008-00

Gentlemen:

The enclosed Licensee Event Report (LER), is submitted in accordance with 10 CFR 50.73 and NUREG 1022, Supplements No. 1 and 2.

Very truly yours,

J. J. Sheppard
General Manager
H. B. Robinson S. E. Plant

RDC:kgs

Enclosure

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

9108120222 910802
PDE ADDL 05000261
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11

NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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 1				PAGE (3) 1 OF 0 3								
TITLE (4) TECHNICAL SPECIFICATION 3.0 IMPLEMENTATION: IVSW ISOLATION TO PERFORM MAINTENANCE																						
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	7	1	1	9	1	0	0	8	0	0	0	8	0	2	9	1	0	5	0	0	0	0
OPERATING MODE (8)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)																				
POWER LEVEL (10)		20.402(b)				20.405(c)				50.73(a)(2)(iv)				73.71(b)								
1 0 0		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 (Specify in Abstract below and in Text, NRC Form 366A)								
		20.405(a)(1)(iii)				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, SR. SPECIALIST - REGULATORY COMPLIANCE										TELEPHONE NUMBER 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 NPDOS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS												
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR						
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO										
ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)																						

On July 11, 1991, in order to conduct planned post maintenance testing on a Reactor Coolant Drain Tank Pump Discharge Line Isolation Valve, Isolation Valve Seal Water (IVSW) was required to be isolated from the containment penetrations it serves. This necessitated implementation of Technical Specification 3.0 because Plant Technical Specifications do not have an action statement for IVSW isolation while at power operation. Thus, as provided by NUREG 1022, Supplement No. 1, the Plant was considered to be operating in a condition prohibited by the Plant's Technical Specifications. Containment integrity was maintained throughout the process. The testing was satisfactorily completed, and the system was returned within the time period allowed by the action statement.

This event is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B)

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

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	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	— 0 0 8	— 0 0	0 2	OF	0 3

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

I. DESCRIPTION OF EVENT

On July 11, 1991, H. B. Robinson Unit No. 2¹ was operating at one hundred percent power. Post Maintenance leak testing was being performed following planned maintenance on Reactor Coolant Drain Tank Pump Discharge Line Auto Isolation Valve WD-1722. This valve had previously been determined to require maintenance on the actuator because it had failed its stroke time testing. The leak testing, which was conducted by a Special Procedure, applied Isolation Valve Seal Water (IVSW) to the piping between valves WD-1721 and WD-1722 to determine a leak rate. However, in order to perform the test, IVSW was required to be isolated to all containment penetrations it serves with the exception of the penetration associated with the valve to be tested. Prior to conducting the maintenance it was determined that, in accordance with Plant Technical Specification 3.3.6.1, 3.3.6.2, and 3.0, this test placed the Plant in an eight hour Limiting Condition for Operation (LCO) due to the inoperability of IVSW to the other penetrations. The LCO was entered at 2038 hours on July 11.

II. CAUSE OF EVENT

In order to conduct the post maintenance testing, system configuration required that IVSW be isolated from all containment penetrations it serves except Penetration 6, which is the penetration associated with the valve that was tested. Thus, entry into the Technical Specification action statement was planned and required.

III. ANALYSIS OF EVENT

The IVSW system operates to minimize the fission product release from the Containment atmosphere to the environment in the event of a Loss of Coolant Accident (LOCA). The system provides a means of injecting seal water into piping between the seats and stem packing of double-disc types of isolation valves, and into the piping between closed globe and diaphragm-type isolation valves, during any condition which requires Containment isolation. 10 CFR 50.73(a)(2)(vii)(C) requires that a Licensee Event Report be submitted for any event where a single cause or condition caused at least one independent train or channel to become inoperable in multiple systems, or two independent trains or channels to become inoperable in a single system designed to control the release of radioactive material.

¹ H. B. Robinson Steam Electric Plant, Unit No. 2, is a Westinghouse Pressurized Water Reactor power plant 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

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 1	— 0 0 8	— 0 0	0 3	OF	0 3

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

Containment integrity was maintained throughout the post maintenance testing process. IVSW was isolated only after WD-1722 had been demonstrated to stroke properly. If a Safety Injection signal had been generated during the testing process, both valves (WD-1721 and WD-1722) would have closed.

In accordance with NUREG-1022, Supplement No. 1, entry into Technical Specification 3.0 represents a "condition prohibited by the plant's Technical Specifications." Therefore, this Licensee Event Report is submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B) and 10 CFR 50.73(C)(2)(vii).

IV. CORRECTIVE ACTIONS

Testing was satisfactorily performed on WD-1722, and the system was returned to service. The LCO action statement was exited on July 11 at 2133 hours.

V. ADDITIONAL INFORMATION

A. Failed Component Information

None

B. Previous Similar Events

LER-91-005

LER-90-001

LER-90-004

LER-90-006