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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9209160167 DOC. DATE: 92/09/10 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.
CHAMBERS, R. H. Carolina Power & Light Co.
RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 92-016-01: on 920805, pressure indicator for H&V unit
found to be reading zero psig resulting in TS violation.
Caused by personnel error. Adverse Condition Rept written &
discussions on procedural compliance conducted. W/920911 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

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	PD2-1 LA	1 1	PD2-1 PD	1 1
	MOZAFARI, B	1 1		
INTERNAL:	ACNW	2 2	AEOD/DOA	1 1
	AEOD/DSP/TPAB	1 1	AEOD/ROAB/DSP	2 2
	NRR/DET/EMEB 7E	1 1	NRR/DLPQ/LHFB10	1 1
	NRR/DLPQ/LPEB10	1 1	NRR/DOEA/OEAB	1 1
	NRR/DREP/PRPB11	2 2	NRR/DST/SELB 8D	1 1
	NRR/DST/SICB8H3	1 1	NRR/DST/SPLB8D1	1 1
	NRR/DST/SRXB 8E	1 1	<u>REG FILE</u> 02	1 1
	RES/DSIR/EIB	1 1	RGN2 FILE 01	1 1
EXTERNAL:	EG&G BRYCE, J. H	2 2	L ST LOBBY WARD	1 1
	NRC PDR	1 1	NSIC MURPHY, G. A	1 1
	NSIC POORE, W.	1 1	NUDOCS FULL TXT	1 1

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Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT
POST OFFICE BOX 790
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SEP 11 1992

Robinson File No: 13510C

RNPD/92-2433
(10CFR50.73)

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261
LICENSE NO. DPR-23
LICENSEE EVENT REPORT NO. 92-016-00

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,

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

RDC:sgk

Enclosure

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

160044

9209160167 920916
PDR ADOCK 05000261
S PDR

920916

EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

DOCKET NUMBER (2)

05000261

PAGE (3)

1

TITLE (4)

TECHNICAL SPECIFICATION VIOLATION DUE TO FAILURE TO IMPLEMENT ACTION STATEMENT

EVENT DATE (5)			LER NUMBER (6)				REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQ. NO.	REV. NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER	
08	10	92	92	- 016	- 00	09	10	92		05000	

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10)	N	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)(vi)		OTHER (Specify in Abstract and Text)			
		20.405(a)(1)(iii)		X 50.73(a)(2)(i)		50.73(a)(2)(vii)(A)					
		20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(vii)(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

(803)383-1179**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)

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 fifteen single space typewritten lines) (16)

On August 5, 1992, H. B. Robinson Unit No. 2 was operating at 100 percent power. During a routine containment entry, a pressure indicator for a Heating and Ventilation (HVH) unit was found to be reading zero psig. The HVH unit was declared inoperable, and the Limiting Condition for Operation (LCO) of Technical Specification 3.3.2.2.a, which allows continued operation for a period not to exceed 24 hours, provided both containment spray pumps are demonstrated to be operable, was entered. However, licensee operators decided that since the containment spray pumps had been demonstrated operable only seven hours earlier that day during scheduled surveillance testing, it would not be necessary to redemonstrate their operability.

Following review of the Shift Supervisor's Log, the Operations Manager later took the position that not demonstrating the containment spray pumps operable after entering the LCO constituted a violation of Technical Specification 3.3.2.2.a.

This event is attributed to personnel error since the Technical Specifications do not provide for taking credit for the earlier testing of the spray pumps. This LER is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B).

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 RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, 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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H. B. ROBINSON, UNIT NO. 2	05000261	92	-	016	-	00
						2

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

I. DESCRIPTION OF EVENT

On August 5, 1992, H. B. Robinson Unit No. 2¹ was operating at 100 percent power. A routine containment entry had been made, and a closeout inspection was in progress as required by plant procedure.² One of the procedural inspections is to verify operability of the Heating and Ventilation System (HVH) Units, which is performed by taking data from pressure indicators for each HVH unit. Pressure indicator PI-1699C for HVH-3 was inspected, and was found to be reading zero psig. The procedural action statement for a HVH unit pressure indicator reading below the required pressure is to declare the associated HVH unit inoperable. The Shift Supervisor and the System Engineer were notified of this condition, and at 0915 hours HVH-3 was declared inoperable. The Limiting Condition for Operation (LCO) of Technical Specification 3.3.2.2.a, which allows continued operation for a period not to exceed 24 hours, provided both containment spray pumps are demonstrated to be operable, was entered.

Following a discussion of the Technical Specification requirements among the licensed members of the operating shift, it was decided that since the containment spray pumps had been demonstrated operable only seven hours earlier that day during scheduled surveillance testing, it would not be necessary to redemonstrate their operability. This decision was made because it was suspected that the HVH unit was in fact operable, but that the associated Pressure Indicator was not functioning. However, this decision process was not documented in the Shift Supervisor's Log.

Maintenance personnel were notified of the condition, and the pressure indicator was replaced.³ The HVH unit was placed back in service, satisfactorily tested, and declared operable at 1310 hours.

On August 10, 1992, during a routine review of the Shift Supervisor's Log, a concern was raised that HVH-3 had been declared inoperable, and the Containment Spray Pumps were not tested as required by Technical Specifications. The Operations Manager was notified of this concern and, after his review of the available documentation and discussion with the individuals involved, took the position that not demonstrating the containment spray pumps operable after entering the LCO constituted a violation of Technical Specification 3.3.2.2.a. This was based on the belief that taking credit for the earlier testing of the spray pumps could not be allowed.

¹ H. B. Robinson Steam Electric Plant, Unit No. 2 is a Pressurized Water Reactor in commercial operation since March, 1971.

² PLP-006, "Containment Vessel Inspection/Closeout", revision 20

³ Work Request WR 92-ALMU1

LICENSEE EVENT REPORT (LER) **TEXT CONTINUATION**

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		YEAR		SEQ NO.		REV NO.
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

II. CAUSE OF EVENT

This event is attributed to personnel error. The Technical Specifications do not allow credit to be taken for unrelated actions taken prior to an event as meeting LCO action statement requirements.

III. ANALYSIS OF EVENT

This event had no adverse impact on safety. The pressure indicator for HVH-3 was verified to be faulty, and operability of the HVH unit was not affected.

This LER is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) as an operation or condition prohibited by the plant's Technical Specifications.

IV. CORRECTIVE ACTIONS

An Adverse Condition Report⁴ was written to document the event and to ensure an evaluation is performed. The Operations Manager issued a directive to licensed operators stating that under any condition where an LCO is entered, the required action statement must be taken at that time, and credit cannot be allowed for unrelated actions taken prior to the event. This directive also emphasized the necessity of procedural and Technical Specification compliance, and the importance of keeping accurate and complete log information. Additionally, the Operations Manager conducted personal discussions on procedural and Technical Specification compliance with each of the Operating shifts.

V. ADDITIONAL INFORMATION

A. Failed Components

None

B. Previous Similar Events

None

⁴ ACR 92-288