

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) H. B. Robinson Unit 2										DOCKET NUMBER (2) 0 5 0 0 0 2 6 1 1										PAGE (3) 1 OF 0 3									
TITLE (4) Steam Flow/Feed Flow Mismatch Technical Specifications Required Test Discrepancy																													

EVENT DATE (5) 1 1 1 8 8 5 8 5									LER NUMBER (6) 0 2 3 0 0									REPORT DATE (7) 1 2 1 6 8 5									OTHER FACILITIES INVOLVED (8) FACILITY NAMES DOCKET NUMBER(S) 0 5 0 0 0											
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) 9 8			20.402(b)									20.406(c)									50.73(a)(2)(iv)									73.71(b)								
			20.406(a)(1)(i)									50.36(c)(1)									50.73(a)(2)(v)									73.71(c)								
			20.406(a)(1)(ii)									50.36(c)(2)									50.73(a)(2)(vi)									OTHER (Specify in Abstract below and in Text, NRC Form 366A)								
			20.406(a)(1)(iii)									X 50.73(a)(2)(i)									50.73(a)(2)(viii)(A)																	
			20.406(a)(1)(iv)									50.73(a)(2)(ii)									50.73(a)(2)(viii)(B)																	
			20.406(a)(1)(v)									50.73(a)(2)(iii)									50.73(a)(2)(x)																	

LICENSEE CONTACT FOR THIS LER (12)																			
NAME George Honma															TELEPHONE NUMBER AREA CODE 8 1 0 3 3 1 8 1 3 1 - 4 1 5 2 1 4				

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)														
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs				

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 November 18, 1985, at approximately 1000 hours with the Plant at 98% power, a discrepancy was identified between a Technical Specification requirement to "test" the Steam/Feedwater Flow Mismatch and its complying monthly Maintenance Surveillance Test, MST-014. The discrepancy was identified during a review by CP&L. A change to the Technical Specification in 1984 to incorporate the test requirements was thought to have been satisfied by a monthly surveillance test which already existed. Although the Surveillance Test tripped the Steam/Feedwater Flow Mismatch bistables, the setpoints of the comparators were not verified; therefore, not satisfying the definition of "test" in Technical Specifications.

A review of the annual calibration surveillance test results and a subsequent test of the Steam/Feedwater Flow Mismatch comparators demonstrate that the comparators would have performed their intended function.

Corrective action is to strengthen the procedure that governs changes to the Technical Specifications. This will include an accountability of the form currently distributed to identify procedure changes resulting from the Technical Specification change. In this event, the key response which may have identified the discrepancy was unaccounted for. This procedure change should prevent the recurrence of this event.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES: 8/31/85

FACILITY NAME (1) H. B. Robinson Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 2 6 1	LER NUMBER (6)			PAGE (3)		
		YEAR 8 5	SEQUENTIAL NUMBER — 0 2 3	REVISION NUMBER — 0 0			

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

Event

At approximately 1000 hours on November 18, 1985, the Plant was at 98% power. A discrepancy was identified between a Technical Specification requirement to "test" the Steam/Feedwater Flow Mismatch and its complying monthly Maintenance Surveillance Test, MST-014.

This discrepancy was identified during a systematic review of the Reactor Protection Operating Work Procedures by Operations personnel. No other discrepancies between Technical Specifications surveillance requirements and the surveillance test were identified during this review.

MST-014 includes tripping the Steam/Feedwater Flow Mismatch bistables but does not verify the actual setpoint (test) of the Steam/Feedwater Flow Mismatch comparator.

The Steam/Feedwater Flow Mismatch with a Low Steam Generator Level signal produces a Reactor Trip designed to anticipate a loss of Heat Sink. Although no credit is taken for this Reactor Trip in the safety analysis and it was not originally required by the Plant's Technical Specification, it has been a part of the Plant's refueling interval calibration program. "As-found" data from the last two calibrations conducted in May, 1983 and August, 1984 demonstrate that the Steam/Feedwater Flow Mismatch comparators remain stable during the operating cycle and, therefore, would have performed their intended function.

Reason Event Occurred

Following discussions with NRC Region II management, a change to include the Steam/Feedwater Flow Mismatch in the Technical Specification was submitted to the NRC in October, 1983.

Prior to this submittal, it was generally thought that the requirement to test Steam/Feedwater Flow Mismatch coincident with Low Steam Generator Level was already covered by existing surveillances. The Technical Specification change was considered a formality to describe what the Plant was already doing.

It should be noted that a monthly surveillance of the Low Steam Generator Level portion of the reactor trip satisfies its Technical Specification "test" requirement.

The Steam/Feedwater Flow Mismatch surveillance requirement was issued by the NRC and entered as Item 39 to Table 4.1-1 of the Technical Specification in October, 1984.

Proposed Technical Specification changes are routed to appropriate groups to identify procedures which require revision. The procedure that directs this routing did not include accountability for responses. The key response which may have identified that a surveillance test needed changing to meet the "test" requirement was not processed. Therefore, the lack of the accountability along with the presupposition that an existing surveillance test met the proposed Technical Specification change contributed to this event.

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

Corrective Action

The procedure governing changes to the Technical Specifications will be reviewed and strengthened to include an accountability of the responses which identify necessary procedure changes. Surveillance Test MST-014 was temporarily revised on December 3, 1985, to include testing the setpoints of the Steam/Feedwater Flow Mismatch comparators. This MST was performed on December 4, 1985, with satisfactory results.

Impact on Safety

This event did not impact the safety of the Plant. The satisfactory test results of these comparators on December 4, 1985, and the stability of these comparators as documented in the last two calibrations in May, 1983 and August, 1984 demonstrate that these comparators would have performed their intended function.

CP&L

Carolina Power & Light Company

Company Correspondence

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DEC 16 1985

Robinson File No: 13510C

Serial: RNP/85-5264

United States Nuclear Regulatory Commission
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 85-23

Dear Sir:

In accordance with 10CFR50.73, Licensee Event Report, the enclosed Licensee Event Report is submitted. This report fulfills the requirements for a written report within (30) days of a reportable event and is in accordance with the format set forth in NUREG-1022, September, 1983.

Very truly yours,



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

CLW:ac

Enclosure

cc: INPO
J. N. Grace
H. E. P. Krug

IE22
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