

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9409150272 DOC.DATE: 94/09/06 NOTARIZED: NO DOCKET # FACIL: 50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261 AUTHOR AFFILIATION Carolina Power & Light Co. Carolina Power & Light Co. JURY, K.R. HERRELL, M.E. RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-017-00:on 940805, "A" "B" SI pumps was declared

inoperable. Caused by one pump being out of svc for maintenance. "A" & "B" SI pumps was restored.

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

### NOTES:

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EXTERNAL:	EG&G BRYCE, J.H	2	2	L ST LOBBY WARD	1	1
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Carolina Power & Light Company Robinson Nuclear Plant PO Box 790 Hartsville SC 29551

Robinson File No.: 13510C

Serial: RNP/94-1646

SEP 06 1994

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. 94-017-00

## Gentlemen:

The enclosed Licensee Event Report (LER), is submitted in accordance with 10 CFR 50.73.

Very truly yours,

Max E. Herrell

Acting Plant General Manager

DTG:dtg 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

9409150272 940906 PDR ADDCK 05000261 IE22)

Enclosure to Serial: RNP/94-1646

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)

(See reverse for required number of digits/characters for each block)

FACILITY NAME (1)
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2

DOCKET NUMBER (2) PAGE (3) 050-261 1 OF 3

TITLE (4)

NAME

TECHNICAL SPECIFICATION 3.0: SAFETY INJECTION PUMP TESTING

EVE	NT DATE	(5)	LER NUMBER (6)			REP	REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISIO NUMBER	" II MONTH	DAY	YEAR	FACILITY	NAME	DOCKET NUMBER 05000		
08	05	94	94	017	00	09	06	94	FACILITY	NAME	DOCKET NUMBER 05000		
OPERATING THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)						e) (11)							
MODI	E (9)	N	20.402(b)		20.405	(c)			50.73(a)(2)(iv)	73.71(b)			
PO	MER	400	20.	405(a)(1)(i)		50.360	c)(1)			50.73(a)(2)(v)	73.71(c)		
LEVE	(10)	100	20.405(a)(1)(ii)			50.360	50.36(c)(2)		50.73(a)(2)(vii)		OTHER		
			20.	405(a)(1)(iii)		50.730	a)(2)(i	)		50.73(a)(2)(viii)(A)	(Specify in		
		20.405(a)(1)(iv) 20.405(a)(1)(v)		50.73(	50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)	Abstract below				
				50.73(	50.73(a)(2)(iii)			50.73(a)(2)(x)	and in Text, NRC Form 366A)				

LICENSEE CONTACT FOR THIS LER (12)

K. R. Jury: Manager - Licensing/Regulatory Programs

TELEPHONE NUMBER (Include Area Code)

(803) 383-1363

CAUSE SYSTEM COMPONENT MANUFACTURER REPORTABLE TO NPRDS CAUSE SYSTEM COMPONENT MANUFACTURER	TO NPRDS

On August 5, 1994, with H. B. Robinson Steam Electric Plant, Unit No. 2 operating at 100% power, the "B" Safety Injection (SI) pump was taken out of service for corrective maintenance. In accordance with Technical Specification (TS) 3.3.1.2.b, the remaining operable SI pump (i.e., the "A" pump) was then tested. Performance of portions of this operability test results in the pump being tested becoming inoperable. TS Section 3.0 was entered when the "A" SI pump was declared inoperable during performance of this Operations Surveillance Test since the "B" SI pump was already inoperable.

TS 3.0 was entered since the action required by TS 3.3.1.2.b could not be met without placing the plant in a condition for which there is not an action statement (i.e., a condition prohibited by TS). The "A" SI pump was inoperable for a period of twenty three minutes; an operator was located at the pump throughout the test and could have taken manual action should the pump have been required to perform its intended function.

This event is reported pursuant to 10 CFR 50.73(a)(2)(i)(B) as operation in a condition prohibited by TS.

Enclosure to Serial: RNP/94-1646

NRC FORM 366A (5-92)

### U.S. NUCLEAR REGULATORY COMMISSION

#### APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95

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## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

	DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)
H. B. ROBINSON, UNIT 2		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	_
	050-261	94	017	00	2 OF 3

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

## I. DESCRIPTION OF EVENT

On August 5, 1994, H. B. Robinson Steam Electric Plant, Unit No. 2 was operating at 100% power. At 1132 hours the High Pressure Safety Injection (SI) system (EIIS Code: BQ) "B" SI pump (EIIS Code: BQ) was taken out of service for corrective maintenance. Technical Specification (TS) 3.3.1.2.b states, "If one safety injection pump becomes inoperable during normal reactor operation, the reactor may remain in operation for a period not to exceed 24 hours, provided the remaining safety injection pump is demonstrated to be operable prior to initiating repairs." In accordance with this requirement, the "A" SI pump was then tested to ensure its operability prior to the initiation of maintenance on the "B" SI pump. Performance of the Operations Surveillance Test (OST) 151, "Safety Injection System Component Test," requires SI flow to be diverted to the Refueling Water Storage Tank (RWST) (EIIS Code: TK) through the SI test line. Since the required injection flow rate is not automatically attainable during this testing configuration, the pump being tested is declared inoperable. TS Section 3.0 was entered when the "A" SI pump was declared out of service at 1316 hours for the performance of this TS required test.

### II. CAUSE OF EVENT

The cause of this situation was that while one SI pump was out of service for maintenance, the action required by TS 3.3.1.2.b could not be met without placing the plant into a condition for which there is not an applicable action statement, resulting in a condition prohibited by TS.

TS Section 3.3.1.2.b requires that when one SI pump becomes inoperable during normal operation, the remaining SI pump must be demonstrated operable prior to initiating repairs. During this operability test an SI pump does not have full design flow capability if injection into the Reactor Coolant system (EIIS Code: AB) is required, since an additional flow path to the RWST through the SI test line exists. Due to system configuration that is necessary to conduct the operability test, the SI pump that was being tested was declared inoperable based upon the definition of operability in TS Section 1.3.

Previous interpretations of TS Section 3.3.1.2.b assumed that the requirement to test the remaining SI pump allowed the actions necessary to perform the required operability test. A recent re-interpretation of TS Sections 1.3 and 3.3.1.2.b was applied to the performance of the TS required SI pump operability test, as a result, a condition prohibited by TS was determined to exist.

NRC	FORM	366A
15-9	21	

## U.S. NUCLEAR REGULATORY COMMISSION



# LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

## III. ANALYSIS OF EVENT

During the time that the "A" SI pump was being tested, the SI pump was in operation and automatic start features were not inhibited. However, during this operability test an SI pump does not have full design flow capability if injection into the Reactor Coolant system is required, since an additional flow path to the RWST through the SI test line exists. The "A" SI pump was inoperable for only twenty three minutes and an operator was located at the pump with the ability to manually stop flow to the RWST should the pump be required to perform its intended function. As a result, the safety significance of this system configuration was low.

## IV. <u>CORRECTIVE ACTIONS</u>

The "A" SI pump was restored to operable status upon completion of the OST, approximately twenty three minutes after it was declared inoperable. The "B" SI pump was restored to operable status at 1538 hours on August 5, 1994. Additionally, a TS change request which would eliminate testing operable pumps prior to initiating repairs on another pump, was submitted to the NRC on July 29, 1994.

## V. ADDITIONAL INFORMATION

A. Failed Component Information

None

B. Previous Similar Events

None