



Serial: RNP-RA/09-0072

AUG 26 2009

Attn: Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

LICENSEE EVENT REPORT NO. 2009-002-00
FAILURE TO COMPLETE TECHNICAL SPECIFICATIONS
REQUIRED ACTION WITHIN THE ALLOWED COMPLETION TIME

Ladies and Gentlemen:

The attached Licensee Event Report is submitted in accordance with the requirements of 10 CFR 50.73. Should you have any questions regarding this matter, please contact Mr. C. A. Castell at (843) 857-1626.

Sincerely,

A handwritten signature in black ink that reads "Kenneth B. Jones for".

W. Scott Saunders
Plant General Manager
H. B. Robinson Steam Electric Plant, Unit No. 2

CAC/ahv

Attachment

c: L. A. Reyes, NRC, Region II
T. J. Orf, NRC, NRR
NRC Resident Inspector

Handwritten initials "JEA2" above "NRR" in black ink.

LICENSEE EVENT REPORT (LER)

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

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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4. TITLE
Failure to Complete Technical Specifications Required Action Within the Allowed Completion Time

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	29	2009	2009	002	00	08	27	2009		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE: 1

10. POWER LEVEL: 100%

11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)

<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)
<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(j)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME Ashley Valone	TELEPHONE NUMBER (Include Area Code) 843-857-1256
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13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED: YES (If yes, complete 15. EXPECTED SUBMISSION DATE) NO

15. EXPECTED SUBMISSION DATE: MONTH: DAY: YEAR:

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

At 1611 hours EDT on June 29, 2009, with H. B. Robinson Steam Electric Plant, Unit No. 2, operating at approximately 100% power, Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.0.3 was unknowingly entered based on failure to meet the required actions of TS LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation." The condition prohibited by the TS was in effect for approximately two minutes and posed no adverse effect to the health and safety of the public. The required actions in effect at the time were associated with TS LCO 3.3.2, Conditions D and E, Required Actions D.1, D.2.1, E.1, and E.2.1, which provide actions for inoperability of one containment pressure channel.

The cause of this event was determined to be insufficient work instructions to describe the impact of the repair activities for the containment pressure channel. During the repair, the channel was removed from the tripped condition due to interruption of power when the comparator was removed from the circuit. The channel was returned to the tripped condition within about 2 minutes by replacement of the comparator and subsequently returned to operable status. Removing the channel from the tripped condition resulted in a failure to meet the required actions associated with TS LCO 3.3.2, which is a condition prohibited by the plant's Technical Specifications. Therefore, this condition is reportable under 10 CFR 50.73(a)(2)(i)(B), for any operation or condition which was prohibited by the plant's Technical Specifications.

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NARRATIVE

I. DESCRIPTION OF EVENT

At 0113 hours EDT on June 29, 2009, with H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, operating at approximately 100% power, personnel commenced performance of procedure MST-022, "Safeguard Relay Rack Train 'A'," to meet Technical Specifications (TS) surveillance requirements. During performance of the procedure for Pressure Channels [JE,CHA] (PC)-455E and PC-456D, a Containment High/High-High Pressure Alarm [JE,PA] was received on the Reactor Turbine Generator Board [IB] and Emergency Response Facility Information System [ID]. At 0124 hours EDT, MST-022 was suspended, Containment Pressure Channel PC-953A was taken out of service, and the Action Statements for TS Limiting Condition for Operation (LCO) 3.3.2 Conditions D and E were entered. At 0255 hours EDT, PC-953A was placed in the tripped position in accordance with the action statement. At 0259 hours EDT, PC-953A was removed from service in accordance with procedure OWP-032, "Containment Pressure." At 1550 hours EDT, work activities commenced to replace PC-953A test switch [JE,33] and PC-953A, Containment Spray Initiation Comparator.

The bistables [JE,10] for containment pressure protective function circuitry have a unique design (See Figure 1 and Figure 2). The Containment High-High Pressure function is "energize-to-actuate," such that interruption of the power supply for maintaining the channel in trip results in a failure to keep the channel in the desired trip condition. The replacement of the PC-953A comparator resulted in the loss of the power supply and hence the channel was removed from the trip condition at 1611 hours EDT for approximately two minutes. With the comparator removed, the channel was unable to perform its safety function. This condition resulted in the failure to meet the required actions associated with TS LCO 3.3.2 Required Actions D.1 and E.1, "Place channel in trip," and Required Actions D.2.1 and E.2.1, "Be in Mode 3." TS LCO 3.3.2 Required Actions D.1 and E.1 have Completion Times of 6 hours. TS LCO 3.3.2 Required Actions D.2.1 and E.2.1 have Completion Times of 12 hours. The Completion Times were not met and therefore resulted in a condition that was prohibited by the plant's TS and unknowingly placed the plant in TS LCO 3.0.3 because the removal of the channel from the trip condition occurred greater than 12 hours from the time the action statement was entered.

II. CAUSE OF EVENT

The cause of this event was determined to be that the work order instructions associated with the replacement of the comparator did not sufficiently describe the direct impact to the function of the channel. The cause and circumstances that led to the inadequacy of the work order were investigated. Causal factors that contributed to this event were; assumptions made by the Control Room Shift Supervisor (CRSS) were not validated and an operator knowledge gap in containment pressure channel design and the associated impact on TS requirements. The work was allowed to be performed because the CRSS believed the TS action statement could be re-entered and that only the indication would be lost.

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III. ANALYSIS OF EVENT

The condition described in this Licensee Event Report is reportable under 10 CFR 50.73(a)(2)(i)(B), for any operation or condition which was prohibited by the plant's Technical Specifications.

This event was investigated using the HBRSEP, Unit No. 2, Corrective Action Program (CAP) and documented in Significant Adverse Nuclear Condition Report 342794. The significant adverse condition investigation associated with this reportable event was reviewed by the Plant Nuclear Safety Committee on August 5, 2009. The investigation of this condition prohibited by TS determined that the work order instructions associated with the replacement of the comparator did not sufficiently describe the direct impact to the function of the channel.

Additionally, the investigation determined that the trip function of Containment Pressure Channel PC-953A was lost for approximately two minutes, during the time the comparator was removed from the circuit. This is due to the Containment High-High Pressure Function being an energize-to-actuate function and the comparator provides the power supply to maintain the channel in trip.

During the investigation, the extent of condition was evaluated for the Containment High-High Pressure Channel due to its unique protective function circuitry. No additional instances were identified in which HBRSEP, Unit No. 2, was placed in a condition prohibited by the TS during previous similar work activities.

The safety significance of this event is considered very low due to only a single channel of Containment Pressure Engineered Safety Feature being affected. The five remaining channels associated with the Containment High-High Pressure Spray actuation, containment isolation, and steam line isolation functions were operable. The High-High Containment Pressure function was outside TS requirements for approximately two minutes during the comparator replacement. The total time that the inoperable channel was not in the trip condition was less than the TS allowed six hours to place the channel in a trip after it has been declared inoperable. Therefore, this event posed negligible adverse safety consequences for the public or plant personnel.

IV. CORRECTIVE ACTIONS

Completed Corrective Actions:

- Channel PC-953A was restored to trip condition at 1613 hours EDT. The channel was tested and restored to operable status at 2156 hours EDT.

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- Existing work order instructions associated with Containment Pressure channel equipment were revised to specifically address TS requirements for maintaining the channel in trip.
- Procedure, LP-301, "Containment Pressure Channels 950, 950B, 951, 952, 953, 954, and 955," was revised to clearly describe the plant impact of interrupting power in this circuitry and the applicable TS requirements.
- A training request form was initiated for the Containment Pressure channel design knowledge gap for operations. This training request form is expected to be dispositioned in accordance with the applicable Systematic Approach to Training processes.

Planned Corrective Actions:

- Procedure, OWP-032, "Containment Pressure," is scheduled to be revised by September 15, 2009, to clearly describe the plant impact of interrupting power in this circuitry and the applicable TS requirements.

V. ADDITIONAL INFORMATION

Previous Similar Events:

Licensee Event Reports (LERs) for HBRSEP, Unit No. 2, were reviewed from the past 10 years. The following events were identified as being similar to the events described in this LER:

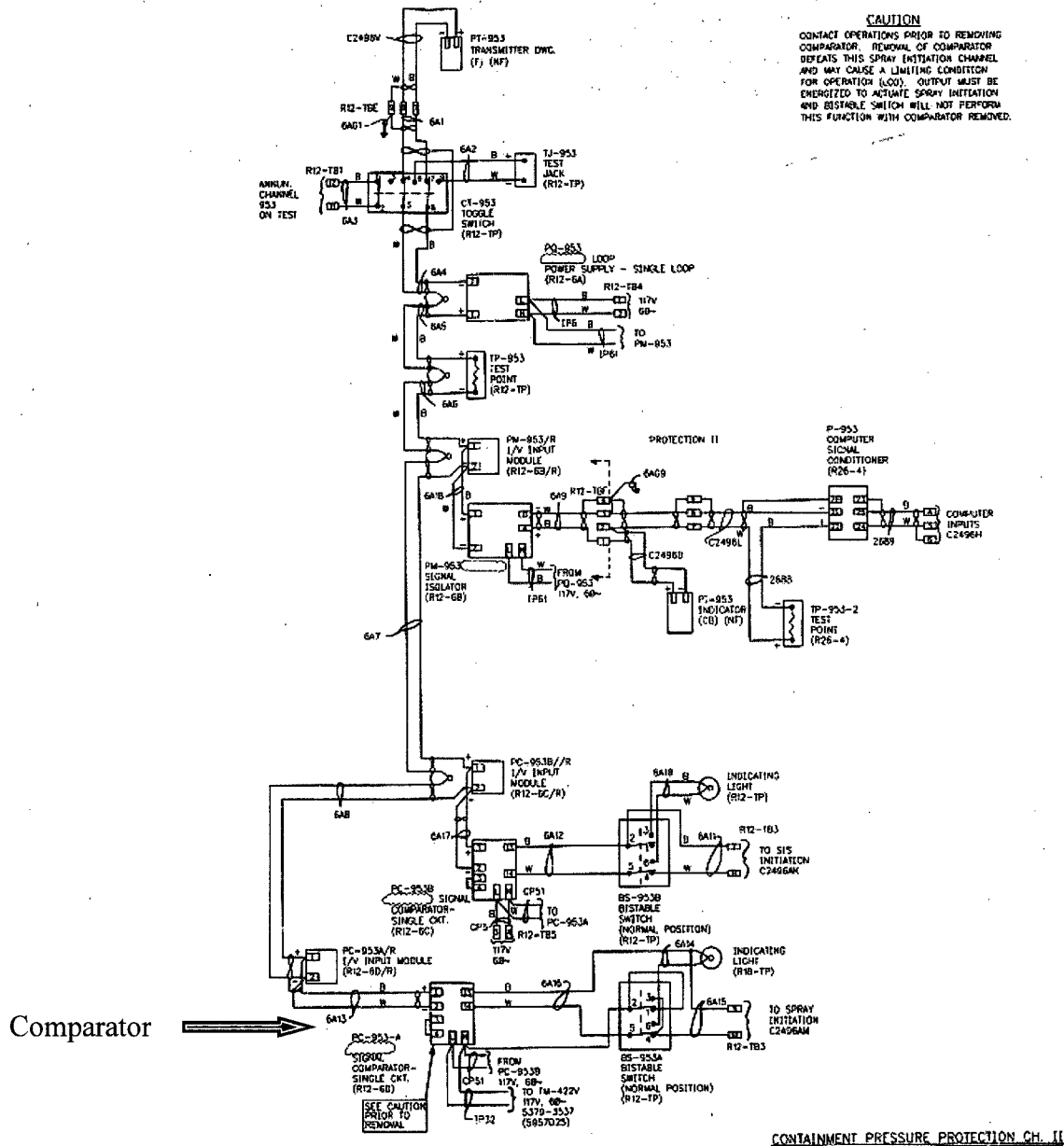
- LER 2003-001-00, Failure to Complete Technical Specifications Required Action within the Allowed Completion Time. This event was a failure to meet the required actions associated with TS LCO 3.1.7. "Rod Position Indication," due to operator error. The causes and corrective actions for this event are not considered applicable to the event described in LER 2009-002-00.

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Figure 1
Hagan Wiring Diagram

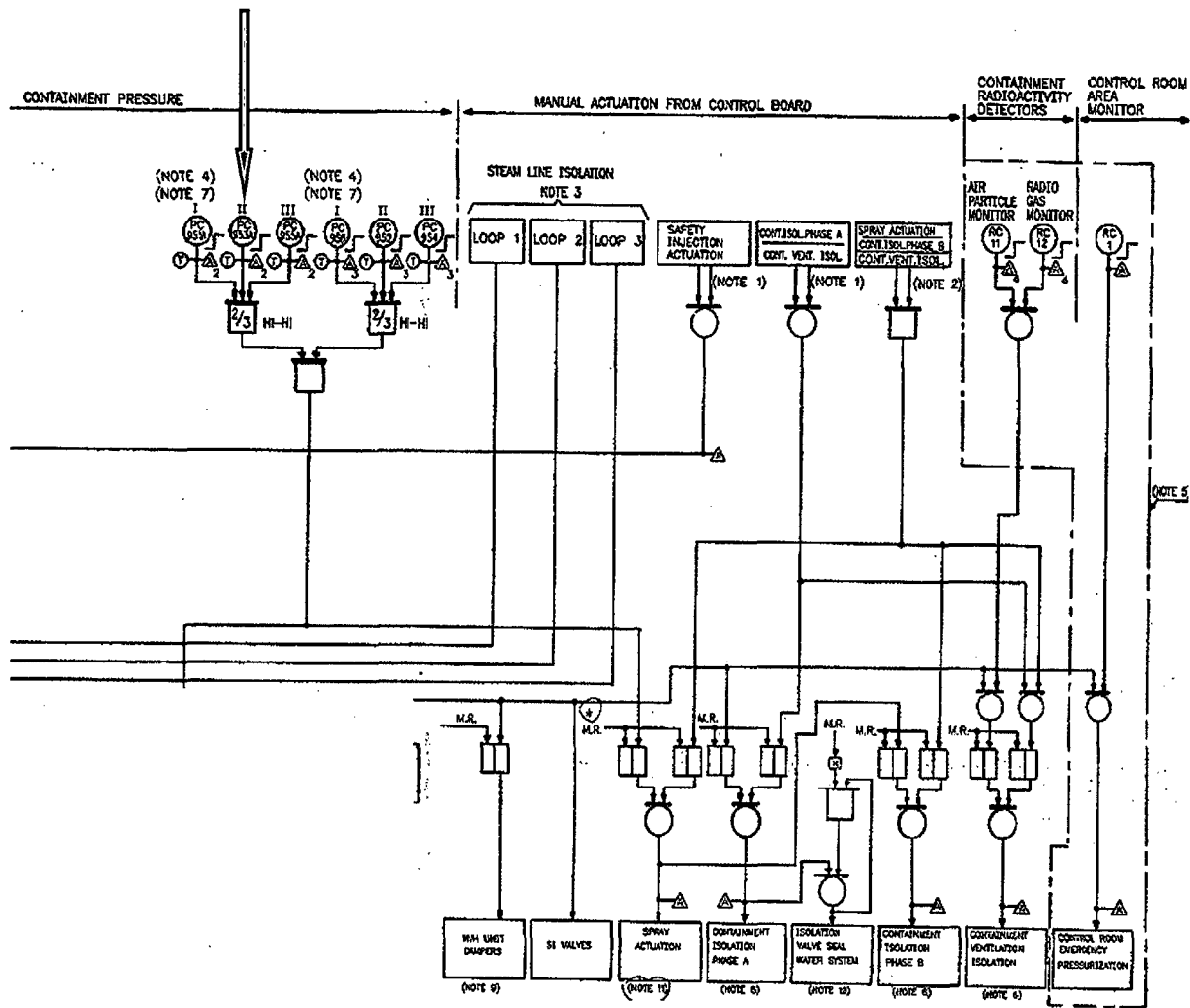


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Figure 2
Logic Diagram - Safeguards Actuation Signals



NOTES:

1. TWO MOMENTARY PUSH BUTTONS; PRESSING OF EITHER PUSH BUTTON WILL ACTUATE.
2. TWO MOMENTARY PUSH BUTTONS; ACTUATION IS EFFECTED ONLY IF BOTH PUSH BUTTONS ARE PRESSED SIMULTANEOUSLY.
3. ONE MOMENTARY PUSH BUTTON PER LOOP.
4. CONTAINMENT PRESSURE BISTABLES FOR SPRAY ACTUATION ARE ENERGIZE-TO-ACTUATE (OTHER BISTABLES ARE DE-ENERGIZE-TO-ACTUATE).
5. ENCLOSED CIRCUITRY IS NOT PART OF THE SAFEGUARDS SYSTEM AND IS NOT REDUNDANT.
6. COMPONENTS ACTUATED BY CONTAINMENT ISOLATION SIGNAL (PHASE A&B) AND COMPONENTS ACTUATED BY CONTAINMENT VENTILATION ISOLATION ARE ALL INDIVIDUALLY SEALED IN (LATCHED), SO THAT LOSS OF THE ACTUATION SIGNAL WILL NOT CAUSE THESE COMPONENTS TO RETURN TO THE POSITION HELD PRIOR TO THE ADVENT OF THE ACTUATION SIGNAL.
7. PC-95B, PC-95A & PC-95B ARE FED BY THE DIESEL AUTOMATICALLY ON BLACKOUT.
8. UNDERVOLTAGE INCLUDES 48B VAC AND/OR 125 VDC CONTROL POWER.
9. COMPONENTS ACTUATED BY SI SIGNAL ARE INDIVIDUALLY SEALED IN (LATCHED) SO THAT LOSS OF THE ACTUATION SIGNAL WILL NOT CAUSE THESE COMPONENTS TO RETURN TO THE POSITION HELD PRIOR TO THE ADVENT OF THE ACTUATION SIGNAL.
10. COMPONENTS ACTUATED BY SI SIGNAL, CONT. VENT. ISOL AND PHASE A ISOL. ARE INDIVIDUALLY ELECTRICALLY SEALED IN SO THE LOSS OF THE ACTUATION SIGNAL WILL NOT CAUSE THESE COMPONENTS TO RETURN TO THE POSITION PRIOR TO ACTUATION SIGNAL.
11. ITEM MARKED WITH * MAY BE MAINTAINED BY KEY LOCK SWITCH.