



Serial: RNP-RA/12-0092

AUG 27 2012

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/RENEWED LICENSE NO. DPR-23

LICENSEE EVENT REPORT NOs. 2012-001-01 AND 2012-003-01
REVISIONS TO CLARIFY TIMELINE AND CAUSE, RESPECTIVELY

Ladies and Gentlemen:

Pursuant to 10 CFR 50.73, Carolina Power and Light Company, now doing business as Progress Energy, is submitting the attached Licensee Event Report revisions. These revisions clarify the timeline of events in LER 2012-001-01 and provide an update to the cause for LER 2012-003-01. Should you have any questions regarding this matter, please contact Mr. R. Hightower, Supervisor – Regulatory Affairs at (843) 857-1329.

This document contains no new Regulatory Commitments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas S. Cosgrove', written over the printed name.

Thomas S. Cosgrove
Plant General Manager
H. B. Robinson Steam Electric Plant, Unit No. 2

TSC/msc

- Attachments: I. LER 2012-001-01, Technical Specification Required Plant Shutdown Due to Missed Surveillance and Operation Prohibited by Technical Specifications
- II. LER 2012-003-01, Plant Modification Interfered with the Operation of Containment Wide Range Level Indicator

c: V. McCree, NRC, Region II
A. Billoch-Colòn, NRC, NRR
NRC Resident Inspector

Progress Energy Carolinas, Inc.
Robinson Nuclear Plant
3581 West Entrance Road
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IEZZ
NRR

United States Nuclear Regulatory Commission
Attachment I to Serial: RNP-RA/12-0092
4 Pages (including cover page)

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

**LER 2012-001-01, TECHNICAL SPECIFICATION REQUIRED
PLANT SHUTDOWN DUE TO MISSED SURVEILLANCE AND
OPERATION PROHIBITED BY TECHNICAL SPECIFICATIONS**

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 FOIA/Privacy Service Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@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.

1. FACILITY NAME H. B. Robinson Steam Electric Plant, Unit No. 2	2. DOCKET NUMBER 05000261	3. PAGE 1 OF 3
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4. TITLE
Technical Specification Required Plant Shutdown Due to Missed Surveillance and Operation Prohibited by Technical Specifications

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
01	17	2012	2012	001	01	08	27	2012		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE
1

10. POWER LEVEL
85.5%

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 checked="" 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 checked="" 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)(i)(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 M. S. Connelly	TELEPHONE NUMBER (Include Area Code) 843-857-1569
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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)

Improved Technical Specifications (ITS) Limiting Condition For Operation (LCO) 3.8.4 states that Train A and Train B DC electric power subsystems shall be OPERABLE in Modes 1, 2, 3, and 4. TS Surveillance Requirement (SR) 3.8.4.6 requires that the operability of Station Batteries be verified every 60 months by conducting a performance capacity test. On January 17, 2012, with H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, in Mode 1 at 85.5% power, it was determined that the surveillance test for the Station-B Battery had become overdue. The last performance of SR 3.8.4.6 on Station-B Battery was completed on October 12, 2005. With the addition of the 25% grace period, the performance test should have been conducted no later than January 12, 2012.

As a result of the missed surveillance requirement, SR 3.8.4.6, the plant completed a Technical Specification required shutdown for failure to meet the LCO 3.8.4. SR 3.8.4.6 for the Station-B Battery was successfully completed on January 28, 2012, with a recorded capacity of 116.4%.

The cause of the event was HBRSEP, Unit No. 2, not having an accurate means of monitoring ITS due dates and over due dates to support scheduling and completion of SRs required to ensure ITS compliance.

The condition described in this Licensee Event Report is reportable in accordance with 10 CFR 50.73(a)(2)(i)(A), the completion of any nuclear plant shutdown required by the plant's Technical Specifications, 10 CFR 50.73(a)(2)(i)(B), any operation or condition which was prohibited by the plant's Technical Specifications, and 10 CFR 50.73(a)(2)(iv)(A), any event or condition that resulted in manual or automatic actuation of the Reactor Protection System, including a reactor trip.

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

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
H. B. Robinson Steam Electric Plant, Unit No. 2	05000261	YEAR	SEQUENTIAL NUMBER	REV. NO.	2 OF 3
		2012	- 001	- 01	

NARRATIVE

I. DESCRIPTION OF EVENT

Improved Technical Specification (ITS) Limiting Condition for Operation (LCO) 3.8.4 states that Train A and Train B DC electrical power subsystems shall be OPERABLE in Modes 1, 2, 3, and 4. ITS Surveillance Requirement (SR) 3.8.4.6 requires that the operability of Station Batteries [EI:BTRY] be verified every 60 months by conducting a performance capacity test. On January 17, 2012, with H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, in Mode 1 at 85.5% power, it was determined that SR 3.8.4.6 for the Station-B Battery had become overdue. The last performance of SR 3.8.4.6 on Station-B Battery was completed on October 12, 2005. The frequency for testing is 60 months and with the addition of the 25% grace period, the performance test should have been conducted no later than January 12, 2012.

At 0921 hours (EST) on January 17, 2012 an investigation regarding an Unplanned LCO ENTRY was initiated due to determination that MST-920 for Station Battery-B may not have been completed within its required periodicity plus grace period. This investigation was to perform an Operability Condition Report and had an expiration of 0921 hours (EST) on January 18, 2012.

At 1814 hours (EST) on January 17, 2012, following discovery of the missed surveillance, plant Operations personnel declared Station-B Battery inoperable and entered the required action for ITS 3.8.4, Condition A, which requires that the DC electrical power subsystem be restored to operable status in 2 hours. At 2014 hours (EST), Operations personnel entered the required action for ITS 3.8.4, Condition B due to required actions and associated completion time for Condition A not met. Condition B requires the unit to be in Mode 3 within 6 hours AND be in Mode 5 within 36 hours. A controlled plant shutdown commenced, in accordance with procedure, at 2223 hours (EST). The reactor was manually tripped at 0038 hours (EST) on January 18, 2012.

SR 3.8.4.6 was successfully completed on January 28, 2012, with a recorded capacity of 116.4%.

II. CAUSE OF EVENT

This event was investigated using the HBRSEP, Unit No. 2, Corrective Action Program (CAP) and is documented in CR 509668.

The CR 509668 investigation concluded that HBRSEP, Unit No. 2, does not have an accurate means of monitoring ITS SR due dates and over due dates to support scheduling and completion of SRs required to ensure ITS compliance. The cause was attributed to inadequate procedural controls and inaccurate data.

III. ANALYSIS OF EVENT

There was an initial delay to comply with the LCO. This was the result of an incorrect determination by site personnel that the condition was an operability concern where as it was a compliance issue.

SR 3.8.4.6 requires that the capacity of Station Batteries be verified every 60 months by conducting a performance capacity test. On January 17, 2012, with HBRSEP, Unit No. 2, in Mode 1 at 85.5% power, it was determined that SR 3.8.4.6 for the Station-B Battery had become overdue. As a result of the missed surveillance, the plant completed a Technical Specification required shutdown for failure to meet the Limited Condition of Operation for Direct Current Sources Operating.

The investigation revealed that daily reports, which were used to track surveillance tests, did not include those tasks to be performed offline unless the plant was in an outage. It was further

**LICENSEE EVENT REPORT (LER)
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		2012	- 001	- 01	

NARRATIVE

determined that the Preventative Maintenance and Surveillance Testing Administration procedure did not provide sufficient guidance to ensure ITS frequencies, due dates and overdue dates were met.

The condition described in this Licensee Event Report is reportable in accordance with 10 CFR 50.73(a)(2)(i)(A), the completion of any nuclear plant shutdown required by the plant's Technical Specifications, 10 CFR 50.73(a)(2)(i)(B), any operation or condition which was prohibited by the plant's Technical Specifications, and 10 CFR 50.73(a)(2)(iv)(A), any event or condition that resulted in manual or automatic actuation of the Reactor Protection System including a reactor trip.

IV. SAFETY SIGNIFICANCE

Following the discovery of the missed SR, the Performance Capacity Test of Station-B Battery was satisfactorily performed on January 28, 2012, with a recorded capacity of 116.4%, indicating the subject equipment was capable of performing its required safety function during the delinquent surveillance interval. Therefore, based on the above, the event had no adverse impact on the health and safety of the public.

V. CORRECTIVE ACTIONS

Completed Corrective Actions:

- The Performance Capacity Test of Station-B Battery was successfully completed on January 28th, 2012, following a Technical Specification required shutdown.
- An interim method of reporting and reviewing ITS SRs was implemented until a more robust method could be developed.

Planned Corrective Actions:

- Revise frequency codes and calculation methods to provide due dates and late dates that are aligned with or conservative to ITS frequencies, due dates and overdue dates.
- Develop and implement a set of site specific procedures to provide implementing guidance for the coordination of SRs at HBRSEP, Unit No. 2.

VI. PREVIOUS SIMILAR EVENTS:

Licensee Event Reports (LERs) for HBRSEP, Unit No. 2, were reviewed from the past 5 years. No similar events were identified.

United States Nuclear Regulatory Commission
Attachment II to Serial: RNP-RA/12-0092
4 Pages (including cover page)

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

**LER 2012-003-01, PLANT MODIFICATION INTERFERED WITH THE
OPERATION OF CONTAINMENT WIDE RANGE LEVEL INDICATOR**

NRC FORM 366 (10-2010)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3150-0104	EXPIRES 10/31/2013
<h2 style="margin: 0;">LICENSEE EVENT REPORT (LER)</h2> <p style="font-size: small; margin: 0;">(See reverse for required number of digits/characters for each block)</p>		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 FOIA/Privacy Service Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@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.	

1. FACILITY NAME H. B. Robinson Steam Electric Plant, Unit No. 2	2. DOCKET NUMBER 05000261	3. PAGE 1 OF 3
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4. TITLE
Plant Modification Interfered with the Operation of Containment Wide Range Level Indicator

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
03	08	2012	2012	003	01	08	27	2012		05000
									FACILITY NAME	DOCKET NUMBER
										05000

9. OPERATING MODE 5	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)(i)(B) <input type="checkbox"/> 50.73(a)(2)(v)(D) Specify in Abstract below or in NRC Form 366A
10. POWER LEVEL 0%	

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME M. S. Connelly	TELEPHONE NUMBER (Include Area Code) 843-857-1569
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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 <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	15. EXPECTED SUBMISSION DATE	MONTH DAY YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On January 19, 2012, at approximately 0557 hours EST, while the H.B. Robinson Unit 2 was shutdown in MODE 5, Condition Report (CR) 510240 was initiated documenting that an NRC inspector identified a chain interfering with the float for the Post Accident Containment Vessel (CV) Water Level Transmitter (LT) for Channel-B. The chain prevented the LT from working correctly. The CV LT was inoperable because it could not indicate a flooded containment level of 375 inches required by the Critical Safety Function Status Trees. On March 7, 2012, work was completed which removed the obstruction. This condition existed since October 15, 2005 when the chain had been installed to restrain a folding gate that is used as a radiation dose barrier during outages. This chain was intended to prevent the folding gate from interacting with safety related equipment during normal operation. LCO 3.3.3 Condition A requires an inoperable channel to be restored in 30 days and if not restored in 30 days, Condition B requires immediate action in accordance with Technical Specification (TS) 5.6.6, PAM Instrumentation Report. TS 5.6.6 is an administrative TS with a 14 day reporting requirement. Since the LT was not returned to an OPERABLE status in 30 days and the required report was not filed in 14 days, this event is reportable under 10 CFR 50.73 (a)(2)(i)(B), operation or condition which was prohibited by the plant's TS.

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CONTINUATION SHEET**

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H. B. Robinson Steam Electric Plant, Unit No. 2	05000261	YEAR	SEQUENTIAL NUMBER	REV. NO.	2 OF 3
		2012	- 003	- 01	

NARRATIVE

I. DESCRIPTION OF EVENT

On January 19, 2012, at approximately 0557 hours EST, while H. B. Robinson Unit 2 was shutdown in MODE 5, Condition Report (CR) 510240 was initiated documenting that an NRC inspector identified that the installation of the chain for the west half of the wall on the south side of the reactor [RCT] shield area was found to interfere with the path of the float for the Post Accident Containment Vessel [VSL] (CV) Water Level Transmitter (LT), LT-802E [LT]. The CV LT was inoperable because it could not indicate a flooded containment level of 375 inches required by the Critical Safety Function Status Trees. On March 7, 2012, work was completed which removed the obstruction.

CR 510240 also determined that LT-802E had been inoperable since October 15, 2005. Although LT-802E would not have been able to provide an indicated flooded containment level of 375 inches, it would have been able to provide the indication of 354 inches required for placing the Reactor Coolant System (RCS) and Residual Heat Removal (RHR) on recirculation.

CR 530799 was initiated on April 16, 2012 to determine the root cause of the event.

II. CAUSE OF EVENT

The installation of LT-802E in 1981 was managed with Modification M-525. The closure of Modification M-525 did not adequately incorporate the changes from the modifications. Specifically, there was no labeling or identification of the level transmitters in the field and there was no drawing change requested to show the location of the installed level transmitters.

III. ANALYSIS OF EVENT

TS Table 3.3.3-1 requires two channels of Containment Sump Water Level (Wide range). Condition A of Limiting Condition for Operation (LCO) 3.3.3 requires the inoperable channel to be restored in 30 days. If not restored in 30 days, Condition B of the LCO requires immediate action in accordance with TS 5.6.6.

TS 5.6.6, Post Accident Monitoring (PAM) Instrumentation Report, states that a report shall be submitted within the following 14 days which outlines the preplanned alternate method of monitoring, cause of inoperability, and the plans and schedule for restoration of the channel.

The PAM Channel in question was determined to be inoperable for greater than 30 days and the required report was not made in 14 days; therefore this event is reportable pursuant to 10 CFR 50.73 (a)(2)(i)(B). The report due date is May 7, 2012, which is based on the date of the reportability determination date, March 8, 2012.

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

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NARRATIVE

IV. SAFETY SIGNIFICANCE

This condition described above did not constitute an unanalyzed condition as LT-802E was available to provide the level indication of 354 inches used by the operators to determine switchover from injection to recirculation mode of operation. Therefore, the safety function of providing level indication for switchover was available even though the alarm function was not available. The containment flooding alarm is a secondary indication of containment flooding. The sources of water causing containment flooding and reaching the alarm setpoint of 375 inches are Fire Water, Service Water, Component Cooling Water, Primary Water, and Steam Generators. The associated alarms and actions are shown below:

Cause	Alarm	Response
Fire Water	Pump start	Investigate cause of start/isolate if required
Service Water	Low flow alarms due to loss of water	Determine cause of low flow and isolate as required
Component Cooling Water	Surge tank low level	Determine cause of low surge tank level
Primary Water	Low primary water tank level	Determine cause of low tank level
Steam Generators [SG]	Decreasing SG level	Determine path out of SG and isolate

If any of the above conditions would have continued to exist, then LT-802E would have provided indication up to approximately 370 inches while Channel A, LT-801E (the redundant channel), would have continued to increase and alarm.

V. CORRECTIVE ACTIONS

Completed Corrective Actions:

- EC 84548 was approved, and on March 7, 2012, the chain was relocated using Work Order 2035875 so that no interaction exists between the chain and level instrumentation float for LT-802E.

Planned Corrective Actions:

- Labeling of LT-802E and other related instruments will be brought up to current plant standards including an exclusion zone. The applicable plant drawing will be updated to include LT-802E and the other related instruments.

VI. PREVIOUS SIMILAR EVENTS:

Licensee Event Reports (LERs) for HBRSEP, Unit No. 2, were reviewed from the past 5 years. There were no similar events found.