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ACCESSION NBR: 9311300121 FACIL: 50-261 H.B. Robins AUTH. NAME AUTHOR STIRLING, R.E. Carolin PEARSON, M.P. Carolin	DDC.DATE: 93/11/15 NDTARIZED: ND son Plant, Unit 2, Carolina Power & Light C R AFFILIATION na Power & Light Co. na Power & Light Co.	DOCKET # 05000261
RECIP. NAME RECIPI	IENT AFFILIATION	R

SUBJECT: LER 93-014-00: on 931015, identified two engineering surveillance tests performed outside TS required interval. Caused by personnel errors & inadequate work controls. Personnel counseled & surveillance reviewed. W/931115 ltr.

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Robinson File No: 13510C Serial: RNP/93-2813 (10CFR50.73)

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. 93-014-00

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,

Rellhoyan for

Marc P. Pearson General Manager

RES:lst Enclosure c: Mr. S. D. Ebneter Mr. W. T. Orders INPO

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Enclosur	<u>e to Ser</u>	ial:	RNP/93-28	813			_						
NRC FORM 366 U.S. NUCLEAR REGULATORY COMMISSION APPROVED BY ONB NO. 3150-0104													
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TITLE (H. B. ROBINSON, UNIT NO. 2 05000 261 1 OF 4												
SURVEILLANCE TESTS EXCEEDED TECHNICAL SPECIFICATION TEST INTERVALS													
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On October 15, 1993, with H. B. Robinson Unit No. 2 in a refueling outage, a Nuclear Assessment Department audit determined that two Engineering Surveillance Tests (ESTs) were performed outside their Technical Specification-required interval. Contrary to the requirement to complete the surveillance test within a six (6) month frequency +/- 25% (184 +/- 46 days), EST-010 was separated by 239 days versus the allowed 230 days. In addition, EST-002 was performed on June 18, 1993, and again on July 30, 1993, separating the testing periods by forty-two (42) days versus the allowed thirty-eight (38) days. Further investigation by Technical Support revealed that an additional surveillance test had been performed outside the required interval. This event is reportable pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.													
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	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 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.			
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On October 15, 1993, with H. B. Robinson Unit No. 2 in a refueling outage, a Nuclear Assessment Department audit determined that two Engineering Surveillance Tests (ESTs) had been performed outside their Technical Specification-required interval. Further investigation by Technical Support revealed that an additional surveillance test had been performed outside the required interval. This event is reportable pursuant to 10 CFR 50.73(a)(2)(i) as a condition prohibited by the plant's Technical Specifications.

II. <u>CAUSE OF EVENT</u>

The cause of this Technical Specification violation is attributable to personnel errors and inadequate work controls.

There are four fundamental causes for the missed and late surveillances:

- 1. The data base and work process used by Technical Support do not automatically reset scheduled due dates for ESTs if the ESTs are performed early. Instead, the system depends on the responsible engineer to notify the Technical Support Surveillance Coordinator (TSSC) to reset the due date. If the responsible engineer forgets to do this or the TSSC fails to do it when asked, the scheduled due date may be outside the required calendar interval plus 25%, as required by Technical Specifications. If the responsible engineer does not remember the exact date the test was last performed, this sets up the possibility of the following test being performed outside the required interval.
- The Technical Support Guideline TSG-116, "Technical Support Surveillance Control," requires no review of the completed surveillance schedule by management, making the process solely dependent on the responsible engineer and the EST Coordinator.
- 3. Technical Support management did not keep track of the EST completion dates, depending solely on the EST Coordinator, the responsible engineer, and the data base to ensure the ESTs were all performed on time. The responsible engineers, though aware of their responsibilities for on-time test completion per TSG-116, did not adequately keep track of dates the tests were accomplished, depending instead on the data base to provide them the correct due dates.

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 The TSSC, though entering t printout, did not pursue di TSG-116 requires the TSSC t and to notify the responsit ESTs. This did not uniform 	the completio screpancies to monitor co ble engineer aly occur.	n dates in a schedule evident from this tas mpletion of scheduled and management of unc	k. ESTs ompleted				
III. <u>ANALYSIS OF EVENT</u>							
Three Engineering Surveillance Specifications were performed o intervals. These tests were:	Tests (ESTs) utside of the	required by Technica eir required testing	1				
EST-010, "Containment Personnel Airlock Leakage Test," performed April 26 ,1992, and again on December 21, 1992. Required interval: 230 days. Actual interval: 239 days.							
EST-002, "Nuclear Instrumentation" Calibration," performed June 18 Required interval: thirty-eight forty-two (42) days.	on System Pow , 1993, and a (38) days.	wer Range Axial Offset again on July 30, 1993 Actual interval:	.				
EST-002, performed July 30, 1993 Required interval: thirty-eight thirty-nine (39) days.	3 and again c (38) days.	on September 7, 1993. Actual interval:					
Investigation by Technical Support two cases above, the test was per- base was not updated to move the responsible engineers depended of available which in fact was not whether the responsible engineer due dates, or whether the TSSC of asked to do so. No written recor- request.	ort managemen erformed earl e following d on the schedu available. rs failed to did not updat ord is requir	It revealed that in the y one time, and the of lue date closer. The ile, so they assumed t It could not be deter ask the TSSC to updat the due dates after red to be kept of the	e first lata ime was mined e the being				
In the third case, the data was taken during the required interval, but the procedure was not fully evaluated and signed off until too late. The responsible engineer stated that he had probably had a mind-set that the test was done when the data was taken and the data analyzed by the cognizant offsite organization.							
Also, the completed monthly EST by management, so no cross-check problem in time to correct it.	schedule is cocurred th	not required to be re at might have detecte	viewed d the				

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There is no safety significance to the late ESTs. In the case of EST-002, the tests were performed just four days and one day late, respectively, and the late tests were both performed satisfactorily (i.e. all peaking factors were within Technical Specification Limits). Additionally, EST-002 requires target axial flux difference bands to be adjusted. Review of operation during the period revealed no operation outside the required bands had the bands been adjusted as required by EST-002. In the case of EST-010, the test was performed just nine days beyond the required interval. Although problems were experienced during the December 1992, test with inner seal leakage, the outer seal did not leak during this test, so containment integrity was not jeopardized by the late performance of EST-010.

IV. CORRECTIVE ACTIONS

IMMEDIATE CORRECTIVE ACTIONS

- The Manager Technical Support, counseled the involved subunit managers, the involved responsible engineers, and the TSSC on the significance and unacceptability of missing required EST due dates.
- 2. The EST schedule was reviewed for other ESTs possibly missed or performed late during Cycle 15. Three additional surveillance tests, although not required by Technical Specifications, were identified as having missed their testing interval.

PROPOSED CORRECTIVE ACTIONS

- TSG-116 and the EST data base will be revised, as determined necessary by Technical Support, to redefine Technical Support management, TSSC and System Engineer responsibilities relative to the control and monitoring of surveillance test performance.
- 2. Training will be provided to all Technical Support personnel involved in ESTs to provide an understanding of their responsibilities for ensuring ESTs are performed on time or exceptions properly documented.

V. ADDITIONAL INFORMATION

Previous Similar Events:

LER 88-013 Surveillance Test Exceeded Technical Specification Test Interval.