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FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
AUTH.NAME AUTHOR AFFILIATION
JURY,K.R. Carolina Power & Light Co.
PEARSON,M.P. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 94-010-00:on 940527,identified that all fuel cask handling crane limit switches had not been adequately inspected due to personnel error.Procedures were prepared & delegated as result of upgrade program.W/940627 ltr.

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CP&L

Carolina Power & Light Company
Robinson Nuclear Plant
PO Box 790
Hartsville SC 29551

10 CFR 50.73

Robinson File No.: 13510C
Serial: RNP/94-1274

JUN 27 1994

United States Nuclear Regulatory Commission
Attention: 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. 94-010-00

Gentlemen:

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

Very truly yours,

Marc P. Pearson
Plant General Manager
H. B. Robinson S. E. Plant

RDC:rdc
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

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Enclosure to Serial: RNP/94-1274

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)	DOCKET NUMBER (2)	PAGE (3)
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT 2	050-261	1 OF 4

TITLE (4)
MISSED SURVEILLANCE TEST RESULTS IN TECHNICAL SPECIFICATION VIOLATION

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
										05000
05	27	94	94	010	00	06	27	94	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	N
POWER LEVEL (10)	100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
	20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
	20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER
	20.405(a)(1)(iii)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
	20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
K. R. Jury: Manager-Licensing/Regulatory Programs	(803) 383-1363

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

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

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 15 single-spaced typewritten lines) (16)

On May 27, 1994, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was operating at 100 percent power. A routine inspection identified that all of the spent fuel cask handling crane limit switches had not previously been adequately inspected in accordance with Technical Specifications (TS). This event was due to personnel error. During the procedure revision process, the TS required tests were inadvertently deleted. A contributing factor to this condition is that the TS requirement is ambiguous with respect to the specific limit switches that are affected, and the applicable operational mode for testing. Failure to conduct the testing within the specified interval did not result in any condition adverse to safety. Administrative controls have been placed on the crane which prohibits its use without management approval. The individuals responsible for the procedure revision and review are no longer employed by CP&L, and the procedures that they were responsible for are under review to ensure that the ability to meet the applicable TS requirement has not been jeopardized. The TS and its bases will be evaluated and the appropriate changes will be submitted to clarify the applicability of this TS surveillance requirement. This report is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) as operation in a condition prohibited by TS.

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

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
H. B. ROBINSON, UNIT 2	050-261	94	010	00	2 OF 4

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

I. DESCRIPTION OF EVENT

On May 27, 1994, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was operating at steady-state conditions with reactor power at 100 percent. During a routine inspection, a licensee Nuclear Assessment Department (NAD) assessor identified that inspection of the spent fuel cask handling crane (EIIS Code: CRN) limit switches (EIIS Code: 33) had not been performed in accordance with Technical Specifications (TS). TS section 3.8.4 requires that during refueling operations the spent fuel cask handling crane limit switches be inspected prior to use, and every six (6) months when not in use. Tests that were performed to meet this TS during the previous refueling outage did not adequately ensure all limit switches were inspected as required. While the typical crane movement limit switches (i.e., travel extremes) were inspected, limit switches for the restricted travel path (i.e., allowed travel path for the spent fuel cask) had not been tested as required.

II. CAUSE OF EVENT

This event was due to personnel error as a result of failure to use adequate self checking practices by the individual responsible for performing changes to crane testing procedures. As part of the Maintenance Procedure Upgrade Program, the Maintenance staff determined that the testing procedures could be improved if a separate procedure was written for each crane. Subsequently, during the process of consolidating Preventative Maintenance (PM) procedures PM-121, "Frequent Inspection of Bridge, Gantry, Overhead and Mobile Cranes, and Monorail Hoists," and PM-122, "Periodic Inspection of Bridge, Gantry, Overhead and Mobile Cranes, and Monorail Hoists," into a single procedure PM-131, "Spent Fuel Cask Gantry Crane," the TS required tests were inadvertently deleted. The safety evaluation preparation and review process for the procedures that implemented these changes were also deficient in that the TS requirements were not identified, and management overview of the process failed to detect and correct the problem prior to its occurrence. A contributing factor to this condition is that the TS surveillance requirement 3.8.4 is ambiguous with respect to the specific limit switches that are affected, and that the TS is only applicable during refueling operations. Our review of the licensing basis for this TS indicates that the restricted path limit switches should be tested only prior to use of the restricted path, and monthly while the crane is in service.

NRC FORM 366A (5-92) U.S. NUCLEAR REGULATORY COMMISSION

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

III. ANALYSIS OF EVENT

A review of the consequence of the failure to perform the testing on the restricted path demonstrates that the test omission had a minimal effect on plant safety. Since the last test of the restricted path limit switches, the crane has not been used for fuel handling activities. Although the crane was used during refueling operations (i.e., movement of core components when there is fuel in the containment vessel and the pressure vessel head is unbolted or removed), failing to test all the crane limit switches within the specified interval did not result in any condition adverse to the safety of the plant or the public.

Based on a broad interpretation of the TS (i.e., the TS applies to all limit switches vs those for the restricted path only), this report is submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) as operation in a condition prohibited by TS.

IV. CORRECTIVE ACTIONS

The spent fuel cask handling crane has been placed under a Shift Supervisor's Clearance, which prohibits its use without management approval.

The individuals responsible for development of the consolidated procedure and the lead person responsible for the procedure revision and review are no longer employed by CP&L. The manager responsible for oversight of Maintenance procedure changes has developed detailed expectations and controls for procedure writers and reviewers.

Procedures that were prepared by the individual involved that implement or demonstrate TS requirements are under review to ensure that the ability to meet the applicable requirement has not been jeopardized. In addition, procedures that were deleted as a result of the Maintenance Procedure Upgrade Program are being reviewed to ensure that all actions that satisfied a regulatory requirement have been appropriately incorporated into another procedure. These reviews will be completed by August 30, 1994.

The TS and its bases will be evaluated and the appropriate changes will be submitted to clarify the applicability of this TS surveillance requirement.

V. ADDITIONAL INFORMATION

A. Failed Component Information

None

B. Previous Similar Events

LER 93-14 and LER 88-13 document TS violations due to missed surveillance tests. These events were caused by test scheduling errors, and were not attributed to procedural inadequacies. Therefore, the corrective actions for these previous events would not have precluded recurrence of the event reported by this LER.