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ACCESSION NBR:9611050288 DOC.DATE: 96/10/30 NOTARIZED: NO DOCKET #
FACIL:50-261 H.B. Robinson Plant, Unit 2, Carolina Power & Light C 05000261
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YOUNG,D.E. Carolina Power & Light Co.

YOUNG, D.E. Carolina Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 96-005-00:on 960930, discovered potential for clogging containment spray nozzles due to degraded ECCS sump screens. Dewatered ECCS sump, examined sump and sump piping & restored ECCS sump screens to acceptable condition. W/961030 ltr.

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Carolina Power & Light Company Robinson Nuclear Plant 3581 West Entrance Road Hartsville SC 29550

Robinson File No: 13510C Serial: RNP-RA/96-0195

OCT 3 0 1996

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. 96-005-00

Gentlemen:

The enclosed Licensee Event Report (LER), is submitted in accordance with 10 CFR 50.73. This report is required to be submitted to the NRC by October 30, 1996.

Very truly yours,

Dale & You

D. E. Young

Plant General Manager

Enclosure

c:

Mr. S. D. Ebneter, Regional Administrator, USNRC, Region II

Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP

Mr. J. Zeiler, USNRC Resident Inspector, HBRSEP

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NRC FORM 366

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 **EXPIRES 04/30/98**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REGULATORY COMMISSION, USASHINGTON, OFFICE OF

MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

DOCKET NUMBER (2)

PAGE (3)

05000-261

1 OF 5

FACILITY NAME (1)

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

LICENSEE EVENT REPORT (LER) (See reverse for required number of

digits/characters for each block)

POTENTIAL FOR CLOGGING CONTAINMENT SPRAY NOZZLES DUE TO DEGRADED ECCS SUMP SCREENS

EVEN	T DAT	E (5)		LER NUMBER (6)	REPO	RT DAT	E (7)	7) OTHER FACILITIES INVOLVED (8)				
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY	YNAME	DOCKET NUMBER 05000		
09	30	96	96	005	00	10	30	96	FACILITY	YNAME	DOCKET NUMBER 05000		
OPERA		N	THIS R	EPORT IS SUBM	ITTED PÜI	RSUANT	TO THE	REQUI	REMENT	S OF 10 CFR §: (Check	one or more) (11)		
MODE	E (9)	14	20.	2201(b)		20.220				50.73(a)(2)(i)	50.73(a)(2)(viii)		
POW		100		2203(a)(1)		20.220	3(a)(3)(i)		50.73(a)(2)(ii)	50.73(a)(2)(x)		
LEVEL	(10)	100	20.	20.2203(a)(2)(i)		20.220	20.2203(a)(3)(ii)			50.73(a)(2)(iii)	73.71		
			20.	2203(a)(2)(ii)		20.2203(a)(4)		20.2203(a)(4)		50.73(a)(2)(iv)	OTHER		
			20.	20.2203(a)(2)(iii)		50.36(c)(1)		×	50 704 14011	Specify in Abstract below			
			20.	2203(a)(2)(iv)		50.36(c)(2)	·		50.73(a)(2)(vii)	or in NRC Form 366A		

LICENSEE CONTACT FOR THIS LER (12)

TELEPHONE NUMBER (Include Area Code)

A. L. Garrou, Manager - Licensing/Regulatory Programs (Acting)

(803) 857-1544

	COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)											
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFAC	TURER REPORTA		
	SUPPLEMENTAL REPORT EXPECTED (14)				FXP	ECTED	MONTH	DAY		YEAR		
YES (If yes, o	omplete EXPI	ECTED SUBMIS	SION DATE).		X	NO	SUBM	MISSION TE (15)				

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On September 11, 1996, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was in cold shutdown conditions for refueling. During an inspection of the Emergency Core Cooling System (ECCS) containment sump, openings were found in the sump screens that could allow debris above a certain size to enter the system. The ECCS sump is designed so that debris that is generated and disbursed by flooding of the containment during a postulated Loss of Coolant Accident (LOCA) is excluded from the ECCS recirculation flow path. On September 30, 1996, we concluded that this condition could have prevented the screens from performing their design function. An assessment of the affect of the degraded sump screen condition concluded that this condition had a low safety significance. The cause of this condition was a lack of configuration control. Additionally, the absence of a specific component identification for the sump screens and inconsistencies in documented licensing and design information contributed to this condition. The sump screens were found to have been previously altered to accommodate pipe restraints and an insulated pipe which traverses the sump. These alterations, as well as previous repairs to the screens, failed to adequately recognize and enforce the design requirements and configuration control standards. Furthermore, procedures for inspecting the ECCS sump, as well implementation of these procedures, are being re-evaluated. The ECCS sump screens were restored to an acceptable functional and structural condition that is within the licensing basis of the system. Specific component identification for the sump screens will be established, and procedural controls for work activities in and above the ECCS sump screen area will be implemented to prevent debris from entering the sump, and to provide controls to prevent alteration of the sump screens without proper design controls. This report is submitted pursuant to 10 CFR 50.73(a)(2)(v)(D).

NRC FORM 366A U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) TEXT CONTINUATION. FACILITY NAME (1) DOCKET LER NUMBER (6) PAGE (3) SEQUENTIAL YEAR REVISION H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 05000-261 2 0F 5 96 005 00

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

DESCRIPTION OF EVENT

I.

On September 11, 1996, H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 was in cold shutdown conditions for refueling. During an inspection of the Emergency Core Cooling System (ECCS) sump, the ECCS sump screens (EIIS Component Code: SCN) located in the containment were noted to be in a degraded condition. As depicted by the attached figure, the ECCS sump is designed so that debris above a certain size that is generated and disbursed by flooding of the containment during a postulated Loss of Coolant Accident (LOCA) is excluded from entering the ECCS recirculation flow path by entering the suction of the Residual Heat Removal (RHR)(EIIS System Code: BP) pumps. During a postulated LOCA, proceduralized emergency operational actions align the RHR system to take suction from the ECCS sump after the usable inventory in the Refueling Water Storage Tank (RWST) (EIIS Component Code: TK) is injected into the reactor vessel. The RHR pumps will then recirculate fluid from the ECCS sump to the Safety Injection (SI) pumps (EIIS System Code: BQ) to inject ECCS water into the reactor, or at the operator's discretion, to the Containment Spray (CS) pumps (EIIS System Code: BE) to spray containment as the conditions dictate. The filtration of the water by the ECCS sump screens is accomplished by the screen assemblies at the sump entrance comprised of two wire screens of one-half inch square mesh and 7/32 inch square mesh, respectively, in series. The screen assemblies at the sump entrance exclude particles from entering the suction piping which could clog the 3/8 inch diameter CS nozzle orifices. However, our assessment identified that the ECCS sump screens were not in accordance with their design in that openings existed in the sump screen assemblies that could allow particles as large as two inches in diameter to enter the system. Further examination of the ECCS sump prompted an internal pipe examination which revealed that an item of debris in excess of the 3/8 inch diameter limit had accumulated in the fourteen inch sump drain piping.

On September 30, 1996, we concluded that the degraded condition of the ECCS filtration sump screens could have prevented them from performing their design function of restricting the size of debris that entered the ECCS recirculation flow path. Accordingly, the degraded condition had the potential to adversely affect the previous operability of the ECCS in the recirculation mode, particularly the functioning of the CS after initial spray using the water in the RWST. As a result, the NRC was notified of this condition on September 30, 1996, at 1825 hours Eastern Daylight Time via the Federal Telephone System (FTS) in accordance with 10 CFR 50.72 (b) (2) (iii) (D) as a condition that alone could have prevented the fulfillment of a safety function that is needed to mitigate the consequences of an accident.

NRC FORM 366A

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U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)
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	H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2	05000-261	96	005	00	3	OF	5

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II. CAUSE OF EVENT

The cause of the degraded condition of the ECCS sump screens was a lack of configuration control. The sump screens were found to have been previously altered to accommodate pipe restraints and an insulated pipe which traverses the sump. These alterations, as well as previous repairs to the screens, failed to adequately recognize and enforce the design requirements and configuration control standards. Additionally, the absence of a specific component identification for the sump screens and inconsistencies in documented licensing and design information contributed to this condition. Furthermore, the existing procedure for inspecting the ECCS sump, as well as its implementation, are being re-evaluated.

III. ANALYSIS OF EVENT

The degraded condition of the ECCS filtration screens could have prevented them from performing their design function of intrusion of debris greater than 3/8 inch into the ECCS recirculation flow path. Particles larger than 3/8 inch could have entered the ECCS and could have resulted in clogging of some of the CS nozzles. As such, the potential existed for rendering the CS functions of preventing an overpressurization of containment by cooling the post-LOCA containment atmosphere, and removing iodine from the post-LOCA containment atmosphere. The Final Facility Description and Safety Analysis Report (FFDSAR) i.e., the original Final Safety Analysis Report, Chapter 6.5, "Leakage Detection and Provisions for the Primary and Auxiliary Coolant Loops," Appendix 6A, "Iodine Removal Effectiveness Evaluation of the Containment Spray System," states that, should some of the CS nozzles become plugged, considerable performance margin is available. At the time of recirculation, there is a greatly reduced dependence on CS for continued iodine removal because most of the absorbable iodine has been removed during initial CS system operation using the water in the RWST. The FFDSAR concludes that plugging of about one-fifth of the CS nozzles in one train of the spray system, complete outage of the other spray system, and disability of all four containment fan coolers could be tolerated at the time of recirculation without losing the ability to transfer residual heat from the containment atmosphere. Furthermore, a qualitative assessment of the affect of the degraded sump screen condition on the operation of the other ECCS components (e.g., pumps, valves) concluded that the likelihood of an adverse impact was small. Therefore, this condition is considered to have a low safety significance.

This condition is reported pursuant to 10 CFR 50.73(a)(2)(v)(D) as a condition that alone could have prevented the fulfillment of a safety function that is needed to mitigate the consequences of an accident.

Enclosure to Serial: RNP-RA/96-0

NRC FORM 366A (4.95)

U.S. NUCLEAR REGULATORY COMMISSION

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2	05000-261	96	005	00	4	OF	5

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IV. **CORRECTIVE ACTIONS**

The ECCS sump was dewatered, and the sump and sump piping was examined. Noted debris was removed from the piping.

The ECCS sump screens were restored to an acceptable functional and structural condition that is within the licensing basis of the system. The ECCS sump was subsequently inspected on October 9, 1996, and found in satisfactory condition.

Specific component identification for the sump screens will be established by December 19, 1996.

Procedural controls will be established by December 19, 1996, for work activities in and above the ECCS sump screen area to prevent debris from entering the sump, and will include controls to prevent alteration of the sump screens without proper design controls.

ADDITIONAL INFORMATION

A. Failed Component Information

None

B. Previous Similar Events

None

NRC FORM 366A (4-95)

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LICENSEE EVENT REPORT (LER)

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