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BAUCOM,C.T. MORGAN,R.E. RECIP.NAME	Carolina Power & Light Co. Carolina Power & Light Co. RECIPIENT AFFILIATION	

SUBJECT: LER 90-005-01:on 900302, failure to test RPS logic channels in accordance w/Tech Specs.

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Carolina Power & Light Company

ROBINSON NUCLEAR PROJECT DEPARTMENT POST OFFICE BOX 790 HARTSVILLE, SOUTH CAROLINA 29550

Company Correspondence

AUG. 3 0 1990

Robinson File No.: 13510C

Serial: RNPD/90-1905 (10 CFR 50.73)

United States Nuclear Regulatory Commission Attn: Document Control Desk Washington, D. C. 20555

> H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2 DOCKET NO. 50-261 LICENSE NO. DPR-23 LICENSEE EVENT REPORT 90-005-01

Gentlemen:

The enclosed Supplemental Licensee Event Report (LER) is submitted in accordance with 10 CFR 50.73 and NUREG-1022 including Supplements No. 1 and 2. This Supplemental LER is required to clarify certain aspects of the previous report, and to expand upon the corrective actions which have been taken. Revised portions are indicated by a right-hand margin bar. This supplement should replace existing copies of the original report dated April 2, 1990.

Very truly yours,

lengar

R. E. Morgan General Manager H. B. Robinson S. E. Plant

CTB:1ht

Enclosure

cc: Mr. S. D. Ebneter Mr. L. W. Garner INPO

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Form 244

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Form 364A }	LICENSEE EVENT REPO	RT (LER) TEXT CONTINU		REGULATORY COMMISS D CM8 NO. 3150-2104 /31/95
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I.	Description of Event			
	In February of 1990, H conservation and load involved in the review test procedures for th Reactor Protection Sys	management. ¹ Site ma and upgrade of certa e testing of Train "A	intenance personnel ain maintenance surv A" and Train "B" of	were eillance the
	MST-011, Reactor Prote	ction Logic Train "A'	' and "B" at "O" Pow	er
•	MST-020, Reactor Prote	ction Logic Train "A'	' at Power	
	MST-021, Reactor Prote	ction Logic Train "B'	at Power	
	Test procedure MST-011 shutdown or hot shutdo of MST-020 and MST-021 and MST-021 are perform performance of these to Technical Specification	wn during outages in cannot be maintained med monthly when the ests satisfies the Su n Table 4.1-1, Item 2	which the monthly in a. Test procedures h unit is at power. The prveillance Requirement 7.	ntervals MST-020 The ents of
· · · · · · · · · · · · · · · · · · ·	During review of these between the at power to startup test (MST-011) examine the scope of the Item 27, states only the monthly during hot shut reactor cold shutdown at month, this testing sha by site personnel revea tested prior to startup MST-020 and MST-021 whe	ests (MST-020 and MST caused maintenance p nese tests. Technica nat "Logic Channel Te tdown and power opera and refueling extend all be performed prio aled that the followi by MST-011, but wer	2-021) and the prior ersonnel to more clo I Specification Tabl sting" shall be periods tions. When periods this interval beyond r to startup. Furth ng logic channels we e not being tested m	to osely le 4.1-1, formed s of d one ner review ere being
	1. Source Range High I	Flux Trip		
	2. Intermediate Range	High Flux Trip		
	3. Power Range High Fl	ux Trip - Low Setpoi	nt	
	4. Two-of-Three Loop I	low Flow Trip		
	¹ H. B. Robinson S Pressurized Water	team Electric Plant Reactor power plant	Unit No. 2 is a Wes in commercial operat	tinghouse

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MAC FORM 344A (9-43)

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Based on these reviews, it was identified on March 2, 1990, that testing of these logic channels was not incorporated into MST-020 and MST-021, and that monthly testing was not being performed when the unit was at power.

Further analysis of these Technical Specification requirements was performed and documented within a Reply to Notice of Violation (dated July 9, 1990) identified by NRC Inspection Report No. 50-261/90-11. Within this Reply, it was acknowledged that the failure to test the Power Range High Flux Trip - Low Setpoint and Two-of-Three Loop Low Flow Trip constituted a violation of the Technical Specifications. It was also determined, based on review of the Technical Specifications and the plant specific hardware configuration, that testing of the Source Range High Flux Trip is only appropriate prior to reactor startup. To address this situation, a license amendment was requested and approved which clarifies Item 27 of Technical Specification Table 4.1-1. Finally, it was determined that logic channel testing of the Intermediate Range High Flux Trip will be performed monthly, unless periods of reactor cold shutdown extend the interval beyond one month, in which case testing will be performed prior to reactor startup.

II. Cause of Event

Enclosure to Serial: RNPD/90-

The cause of this event is a procedural deficiency in that the surveillance tests in question did not address monthly logic channel testing of the affected RPS features.² Two factors have been identified which ultimately resulted in this procedural deficiency.

First, the design of plant equipment originally installed for the testing of RPS logic channels did not consider testing of the four logic channels in question. This equipment can be used to perform functional tests of these logic channels, however, the required testing sequence is atypical of the testing method for RPS logic channels associated with normal, at-power RPS features. For example, at-power testing of the Source Range High Flux Trip logic channel would require the use of jumpers, and could also result in the application of damaging voltages to essential elements of the Source Range channel. In summary, the design of originally installed testing hardware contributed to the presumption that routine monthly testing of these RPS logic channels was not required.

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Enclosure to Serial: RNPD/90-		ľ	í	Í	l	I		Ì		l		Í	ĺ	Í	1	l		1			I	l		l	l	l	I	Í	Í	ſ	l	l		I	I	I	I	I	l	l	l	l	l	l	ſ	l	I	l	ſ	ſ	ſ	1	ſ	ſ		l	l	Í	ſ	ſ	I	Í	I	l	l	ſ	Í	ſ	Í	Í	ſ	Í	Í	Í	Í	Í	Í	ſ	ſ	Í	I	ĺ	l	l		I		I			l		I	l		I	I		ſ	ſ	1	1	1	1	ļ	ļ		-			J	Ĺ	(ļ)	5	2		ſ	/)	2	I	ļ)	2	ł]	(1	Ņ	ľ]		ζ	Ś	ŀ	ł					:		1
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(28-8)	LICENSEE EVENT REPOR	T (LER) TEXT CONTINU		APPROVED C EXPIRES: 8/31	MB NO. 315	
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	an additional NRC Form JOSA's/ (17)			10111	0141	101
	Second, the Technical Sp affected logic channels misinterpretation. Spec Intermediate Range High Setpoint are blocked whe features are not normall operation, it was assume assumption, however, does significant amount of the Any shutdown occurring do than one month would not startup. This in turn we channels would be required within the preceding mon Trip is only applicable of 40%. This feature is also power operation, which ag testing was not required operation at less than 40 feature be operable. If preceding the unit shutdo would have been required summary, the limited appli- contributed to the failun- testing requirements with	are not explicit an ifically, the Sourc Flux Trip, and Powe n reactor power is y in service during d that monthly test s not account for t ne might elapse bet uring this time per have required perf buld create a situa ed for service, but th. Similarly, the when reactor power so not applicable d gain resulted in th . However, any rea D% reactor power wo MST-011 had not be own or reduced powe for service withou licability of the a	d were subject e Range High F r Range High F above 10%. Sin steady-state, ing was not rea he possibility ween performant iod which did ormance of MST tion where the would not have Two-of-Three is above 10%, I uring steady-sin e assumption the ctor shutdown of uld have require en performed with r operation, the t having been the ffected RPS feat	to lux Tri lux Tri nce the full p quired. that a ces of not las -011 pr affect been Loop Lo but les tate, f nat mon pr peri red tha ithin t nis RPS tested. atures	p, p - Lo se ower This MST-01 t long ior to ed log tested w Flow s thar ull thly od of t this he mor featu In	s ger o gic d w n

It should be noted, however, that during the period between identification of the deficiency on March 2, 1990, and completion of testing on March 15, 1990, the unit was not operated at power levels which would have required operability of these RPS features.

III. Analysis of Event

A review of the affected RPS features and associated logic channels has been performed to assess the safety significance of the identified procedural deficiencies. Based on this review, it has been determined that these deficiencies have only minor safety significance. As described in Section 7.2.1.1.6 of the Updated Final Safety Analysis Report (UFSAR), the logic channel identity begins at the logic relay coil/relay contact interface (Reference Figure 1). This interface defines the transition from channel identity to logic identity, and provides both electrical and physical separation between the analog and the logic portions of the RPS. The RPS logic channels would, therefore, encompass the wiring and relays between the analog channels and the reactor trip breakers. The testing requirements of the Technical Specifications for the analog channels and reactor trip breakers were verified to be properly addressed within site surveillance procedures; therefore, the logic channel testing only affects the wiring and relays between the analog channels and the reactor trip breakers.

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Enclosure to Serial: RNPD/90-2005

Typically, the wiring and relays associated with these logic channels are assumed to be more reliable than other components such as transmitters and detectors. These components are not subject to "instrument drift;" there is no check or calibration associated with the logic channels, only a functional test. The potential for a failure or malfunction of these components is considered small. Should a failure occur, the component would fail to the trip or actuate position. Therefore, such a failure would not degrade the ability of the system to respond to a transient. Also, it is considered unlikely that simultaneous failures would occur which would affect both Train "A" and Train "B" of a particular RPS feature.

With respect to the specific RPS features in question, Section 7.2.1.1.2 of the UFSAR describes the Source Range High Flux Trip, the Intermediate Range High Flux Trip, and the Power Range High Flux Trip - Low Setpoint as features that provide protection during reactor startup. Also, Section 15.4.1 of the UFSAR credits the Power Range High Flux Trip - Low Setpoint for terminating the uncontrolled rod cluster control assembly bank withdrawal from subcritical or low power. It is considered unlikely that both trains of three separate startup protection features could be rendered inoperable by the simultaneous failure of independent logic channel components. Therefore, there is a reasonable assurance that one or more of these RPS features would have automatically actuated in response to a reactivity event from a subcritical or low power condition.

Section 7.2.1.1.2 of the UFSAR describes the Reactor Coolant System Low Flow Trip as core protection from Departure from Nucleate Boiling (DNB) following a low flow or loss of flow accident. Also, Section 15.3 of the UFSAR describes the Decrease in RCS Flow Rate Event, however, the analyzed transient is initiated from 102% reactor power, as this is the bounding transient. The Two-of-Three Loop Low Flow Trip is only applicable when reactor power is between 10% and 40%. Typically, reactor operation at less than 40% power occurs infrequently. During periods of reactor operation at less than 40% power, this feature is partially backed up by the RPS actuation from Reactor Coolant Pump (RCP) breakers opening or an undervoltage on the RCP electrical busses. Also, although the automatic response would be delayed by some amount, other RPS features such as the high pressurizer pressure reactor trip would be available for event mitigation. Finally, it is again considered unlikely that both trains of this RPS feature would be rendered inoperable by the simultaneous failure of independent logic channel components during the period when this feature would be required for service, i.e., between 10% and 40% reactor power.

It should again be noted that during the period between identification of the deficiency on March 2, 1990, and completion of testing on March 15, 1990, the unit was not operated at power levels which would have required operability of these RPS features.

NAC FORM 3444

<u>Enclosure t</u>	o Serial:	RNPD/90-	5			
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This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i)(B) as an operation or condition prohibited by the plant's Technical Specifications

IV. Corrective Actions

As stated above in the Analysis of Event, the Power Range High Flux Trip - Low Setpoint and the Two-of-Three Loop Low Flow Trip are credited for mitigation of events analyzed in Chapter 15 of the UFSAR. In order to promptly address testing of these features, temporary procedure changes were implemented on March 13, 1990 which incorporated monthly testing of these features into MST-020 and MST-021. These revised procedures were used to successfully test affected Train "A" logic channels on March 14, 1990, with successful testing of affected Train "B" logic channels being completed on March 15, 1990. These temporary procedure changes were implemented as permanent procedure revisions on April 3, 1990.

Logic channel testing of the Intermediate Range High Flux Trip has been incorporated into MST-020 and MST-021. This feature will be tested monthly, unless periods of reactor cold shutdown extend the interval beyond one month, in which case testing will be performed prior to startup in accordance with MST-011. Permanent changes to MST-020 and MST-021 were completed and implemented on June 15, 1990.

Further review of the Technical Specifications and the plant specific hardware configuration indicate that testing of the Source Range High Flux Trip logic channels is only appropriate prior to reactor startup. The hardware configuration is such that the use of jumpers would be required to accomplish this testing, and testing of this logic channel during power operation could result in the application of damaging voltages to essential elements of the Source Range channel. As such, at-power testing could result in the loss of both Source Range channels, making them unavailable for a subsequent reactor shutdown. Therefore, at-power testing of this logic channel is considered an unacceptable practice. To address this situation, a license amendment request was submitted to clarify Item 27 of Technical Specification Table 4.1-1. This license amendment request was issued on June 21, 1990 as Amendment No. 127 to the Operating License. Also, procedure revision(s) will be prepared and implemented which will ensure logic channel testing of the Source Range High Flux Trip prior to reactor startup, if testing has not been performed within the preceding seven days. Appropriate procedure revisions will be prepared and implemented by September 28, 1990.

LICENSEE EVENT R	EPORT (LER) TEXT CONTIN		REGULATORY COMMISSION D CMB NO. 3150-2104 8/31/35
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identified, and of the overall implementation of Technical Specification surveillance requirements. It is expected that this independent assessment, when considered with previous Technical Specification reviews, will eliminate the potential for future similar occurrences. The scope of this independent assessment, and a plan and schedule for its implementation, is currently under development. Consistent with verbal agreements made with NRC Region II personnel, this plan and schedule will be submitted to the NRC in writing by September 21, 1990.

Finally, the failure to properly incorporate testing of these RPS logic channels into surveillance test procedures will be further reviewed within the Corrective Action Program. Significant Condition Report No. 90-019 has been initiated to evaluate this event and determine root cause. This review will help to ensure that each causal factor which contributed to this occurrence has been identified and addressed.

V. Additional Information

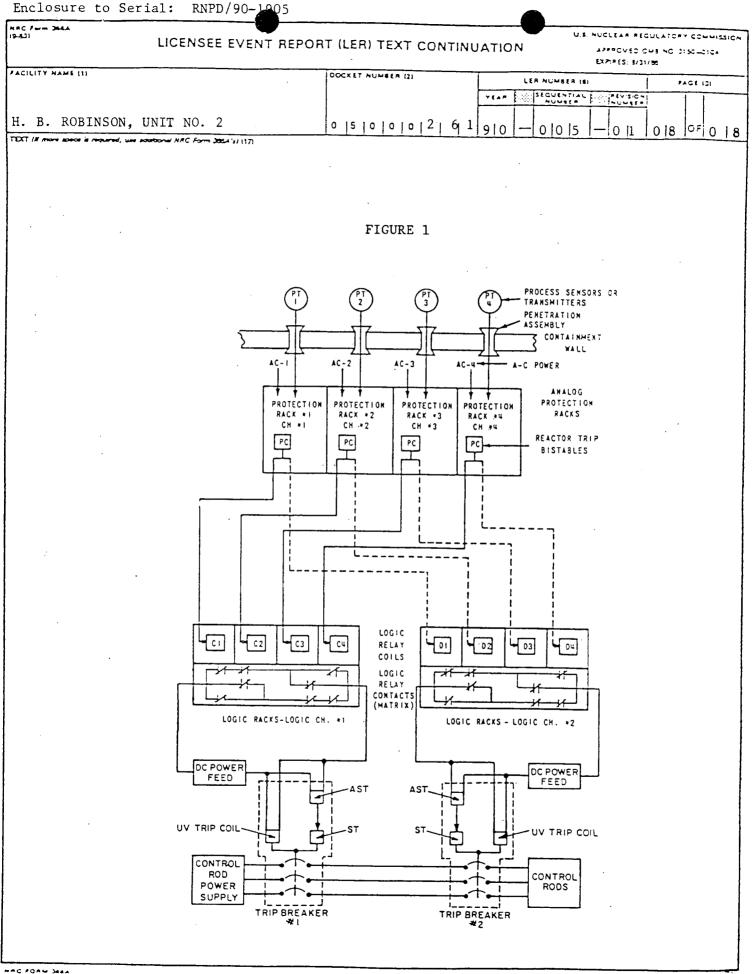
A. Failed Component Identification

None

C FORM 344A

B. Previous Similar Events

Licensee Event Report No. 88-011-01 described a situation where periodic TROTS functional test and calibration procedures required by Technical Specification Table 4.1-1, Item 28, had omitted the TROTS solenoid valves for the turbine stop and control valves.



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