



A CMS Energy Company

Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

February 22, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
LICENSEE EVENT REPORT 00-001, FAILURE TO PERFORM TECHNICAL
SPECIFICATION SURVEILLANCE OF THE POWER DEPENDENT INSERTION LIMIT
ALARM

Licensee Event Report (LER) 00-001 is attached. The LER describes the discovery that the required surveillance of the Power Dependent Insertion Limit (PDIL) Alarm had not been performed within the interval specified by Technical Specification Table 4.17.6 This occurrence is reportable to the NRC in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.

Douglas E. Cooper
General Manager - Plant Operations

CC Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

Attachment

IE22

NRC FORM 366 (6-1998)	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001 Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), 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. If 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.
LICENSEE EVENT REPORT (LER) (See reverse for required number of digits/characters for each block)		

FACILITY NAME (1) CONSUMERS ENERGY COMPANY - PALISADES NUCLEAR PLANT	DOCKET NUMBER (2) 05000255	PAGE (3) 1 OF 3
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TITLE (4)
 FAILURE TO PERFORM TECHNICAL SPECIFICATION SURVEILLANCE OF THE POWER DEPENDENT INSERTION LIMIT ALARM

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
01	25	2000	2000	-- 001	-- 00	02	22	2000	FACILITY NAME	DOCKET NUMBER
										05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
POWER LEVEL (10)	095		20.2201(b)		20.2203(a)(2)(v)	x	50.73(a)(2)(i)		50.73(a)(2)(viii)	
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)	
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71	
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER	
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A	
	20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)					

LICENSEE CONTACT FOR THIS LER (12)	
NAME Sheri L. King, Sr. Technical Analyst	TELEPHONE NUMBER (Include Area Code) (616) 764-2036

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)		
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

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

Technical Specification Table 4.17.6, Item 18, requires that the Channel Functional Test for the setpoint verification on the Power Dependent Insertion Limit (PDIL) Alarm be performed every 31 days (+25%), and Technical Specification Table 3.17.6 identifies the applicable condition for the PDIL Alarm at Hot Standby and above. Collectively, Technical Specifications 3.0.4 and 4.0.4 preclude entry into an operating condition when the conditions for the Limiting Conditions for Operation, including applicable surveillance requirements, are not met and the associated action requires a shutdown. Contrary to the above, on January 25, 2000 at approximately 1211 hours, it was discovered that the required surveillance of the PDIL Alarm had not been performed within its specified interval plus allowable extension before entering Hot Standby condition.

This occurrence is reportable to the NRC in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

The occurrence was caused when License Amendment 85 incorporated LCO 3.0.4 into Technical Specifications. The surveillance procedure did not implement the new Technical Specification requirements and the discrepancy was not recognized. The PDIL surveillance procedure will be revised to align with the Technical Specifications.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET(2)	LER NUMBER (6)			PAGE
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
CONSUMERS ENERGY COMPANY PALISADES NUCLEAR PLANT	05000255	2000	001	00	2 OF 3

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

EVENT DESCRIPTION

Technical Specification Table 4.17.6, Item 18, requires that the Channel Functional Test for the setpoint verification on the Power Dependent Insertion Limit (PDIL) Alarm be performed every 31 days (+25%), and Technical Specification Table 3.17.6 identifies the applicable condition for the PDIL Alarm at Hot Standby and above. Collectively, Technical Specifications 3.0.4 and 4.0.4 preclude entry into an operating condition when the conditions for the Limiting Conditions for Operation, including applicable surveillance requirements, are not met and the associated action requires a shutdown. Contrary to the above, on January 25, 2000 at approximately 1211 hours, it was discovered that the required surveillance of the PDIL Alarm had not been performed within its specified interval plus allowable extension before entering Hot Standby condition.

This occurrence is reportable to the NRC in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

ANALYSIS OF THE EVENT

During surveillance procedure reviews for transition from Current Technical Specifications (CTS) to Improved Technical Specifications (ITS), it was discovered that the required timing for performance of the Channel Functional Test on the PDIL Alarm was incorrect. The surveillance procedure inappropriately allowed performance of the Channel Functional Test to be delayed beyond entry into Hot Standby condition, requiring completion within seven (7) days following reactor criticality.

The PDIL Alarm was tested on September 13, 1999 prior to the refueling outage which started on October 15, 1999. The 31 day (+25%) test interval expired on October 21, 1999 during the refueling outage. The test was not performed again until December 16, 1999, approximately six days after entry into Hot Standby condition.

SCOPE

Research revealed that the original plant computer was not configured to allow testing the PDIL Alarm prior to making the reactor critical. At Palisades, the reactor is made critical during Hot Standby condition. Since at least 1976, the procedure has contained some variation of the following Special Requirement: "Perform within seven (7) days following making the reactor critical." Since that time, outages longer than 31 days (+25%) would have presented the same opportunity to inappropriately enter Hot Standby condition without a current PDIL Alarm surveillance. All such occurrences would be considered Technical Specifications violations since November 9, 1984, when License Amendment 85 incorporated LCO 3.0.4 into Technical Specifications. Before incorporation of License Amendment 85 in November of 1984, performance of the surveillance prior to entry into the applicable plant condition was not explicitly specified.

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SAFETY SIGNIFICANCE

There were no safety consequences associated with this occurrence. The surveillance was performed satisfactorily on December 16, 1999, following start up. There is no indication of any past problems with satisfying shutdown margin requirements due to timing of the performance of this particular surveillance. The surveillance was being performed within approximately seven days of entering Hot Standby.

CAUSE OF THE EVENT

When License Amendment 85 incorporated LCO 3.0.4 into Technical Specifications, the surveillance procedure did not implement the new Technical Specification requirements and the discrepancy was not recognized.

CORRECTIVE ACTION

The PDIL surveillance procedure will be revised to align with the Technical Specifications. This occurrence will be communicated to ITS implementation staff to look for other potential inconsistencies between surveillance requirements and the corresponding implementing procedures.