

March 23, 2000

Douglas E. Cooper
Plant General Manager
Palisades Nuclear Plant

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
LICENSEE EVENT REPORT 00-002, NON-CONFORMANCE WITH TECHNICAL
SPECIFICATION REQUIREMENTS FOR AUXILIARY FEEDWATER PUMP P-8B

Licensee Event Report (LER) 00-002 is attached. The LER describes the reactor being made critical with the manual backup steam supply for Auxiliary Feedwater Pump P-8B inoperable. A Notice of Enforcement Discretion (NOED) had been granted to allow for this 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.

SUMMARY OF COMMITMENTS

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



Douglas E. Cooper
Plant General Manager

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

Attachment

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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.

FACILITY NAME (1)

CONSUMERS ENERGY COMPANY - PALISADES NUCLEAR PLANT

DOCKET NUMBER (2)

05000255

PAGE (3)

1 OF 2

TITLE (4)

NON-CONFORMANCE WITH TECHNICAL SPECIFICATION REQUIREMENTS FOR AUXILIARY FEEDWATER PUMP P-8B

| 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 |
| 02 | 28 | 2000 | 2000 | -- 002 | -- 00 | 03 | 23 | 2000 | | 05000 |
| | | | | | | | | | 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 5: (Check one or more) (11) | | | | |
|--------------------|---|---|--|-------------------|--|---|
| | | 20.2201(b) | | 20.2203(a)(2)(v) | <input checked="" type="checkbox"/> 50.73(a)(2)(i) | 50.73(a)(2)(viii) |
| | | 20.2203(a)(1) | | 20.2203(a)(3)(i) | <input type="checkbox"/> 50.73(a)(2)(ii) | 50.73(a)(2)(x) |
| | | 20.2203(a)(2)(i) | | 20.2203(a)(3)(ii) | <input type="checkbox"/> 50.73(a)(2)(iii) | 73.71 |
| | | 20.2203(a)(2)(ii) | | 20.2203(a)(4) | <input type="checkbox"/> 50.73(a)(2)(iv) | OTHER |
| | | 20.2203(a)(2)(iii) | | 50.36(c)(1) | <input type="checkbox"/> 50.73(a)(2)(v) | Specify in Abstract below or in NRC Form 366A |
| | | 20.2203(a)(2)(iv) | | 50.36(c)(2) | <input type="checkbox"/> 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)

YES
(If yes, complete EXPECTED SUBMISSION DATE).

NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

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

Technical Specification 3.5.1.a requires steam driven Auxiliary Feedwater Pump P-8B to be operable prior to making the reactor critical. Technical Specification 4.9a.2, requires the steam-driven pump to be started alternately from each control room switch and from the pump test-key switch in a three month period. The phrase "each control room switch" refers to the switches that operate the steam supply valves for the normal (automatically actuated) and backup (manually actuated) supplies to the P-8B turbine. The existence of this surveillance requirement, which specifically requires testing of the manual backup steam supply valve, implies that this manual backup steam supply line is a required feature to support operability of P-8B.

Contrary to the above, on February 28, 2000, the reactor was made critical with the manual backup steam supply for P-8B inoperable. A Notice of Enforcement Discretion (NOED) had been granted to allow for this 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.

A Technical Specification Amendment was requested and subsequently granted on March 14, 2000.

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 | 002 | 00 | 2 OF 2 |

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

EVENT DESCRIPTION

Technical Specification 3.5.1.a requires steam driven Auxiliary Feedwater Pump P-8B {P;BA} to be operable prior to making the reactor critical. Technical Specification 4.9a.2, requires the steam-driven pump to be started alternately from each control room switch and from the pump test-key switch in a three month period. The phrase "each control room switch" refers to the switches that operate the steam supply valves for the normal (automatically actuated) and backup (manually actuated) supplies to the P-8B turbine. The existence of this surveillance requirement, which specifically requires testing of the manual backup steam supply valve, implies that this manual backup steam supply line is a required feature to support operability of P-8B.

Contrary to the above, on February 28, 2000, the reactor was made critical with the manual backup steam supply for P-8B inoperable. A Notice of Enforcement Discretion (NOED) had been granted to allow for this 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

On February 5, 2000, a steam leak developed in the underground piping which provides a manual back-up steam supply to Auxiliary Feedwater Pump P-8B turbine. Due to the inability to easily demonstrate complete code compliance for the entire length of underground pipe, a decision was made to consider the manual back-up steam supply inoperable. The manual back-up steam supply line is not credited in any plant Design Basis Event. A Request for Enforcement Discretion was submitted to the NRC to permit plant start-up and subsequent operation for the period of time necessary to process a license amendment. On February 18, 2000, a NOED was granted by the NRC.

SAFETY SIGNIFICANCE

There was no safety significance associated with this occurrence. The manual backup steam supply line is not credited in any plant Design Basis Event.

CAUSE OF THE EVENT

The condition was entered knowingly under an approved NOED.

CORRECTIVE ACTION

A Technical Specification Amendment which removes all references to the manual backup steam supply line was requested and subsequently granted on March 14, 2000.