**Douglas R. Gipson** Senior Vice President, Nuclear Generation

Fermi 2 6400 North Dixie Hwy., Newport, Michigan 48166 Tel: 313.586.5201 Fax: 313.586.4172



10CFR50.73

May 12, 2000 NRC-00-0052

cc:

U S Nuclear Regulatory Commission Attention: Document Control Desk Washington D C 20555

Reference: 1) Fermi 2 NRC Docket No. 50-341 NRC License No. NPF-43

## Subject: Licensee Event Report (LER) No. 00-006

Pursuant to 10 CFR 50.73(a)(2)(iv), Detroit Edison is submitting the enclosed Licensee Event Report (LER) No. 00-006. The LER documents an invalid automatic closure of the E1150F008, Residual Heat Removal (RHR) Division 1 and 2 Shutdown Cooling Outboard Containment Isolation Valve, resulting in a brief interruption of shutdown cooling.

No new commitments are being made in this LER.

Should you have any questions or require additional information, please contact Mr. Norman K. Peterson of my staff at (734) 586-4258.

Sincerely,

J. Dyer A. J. Kugler M. A. Ring M. V. Yudasz, Jr. NRC Resident Office Region III Wayne County Emergency Management Division



NRC (6-199	FORM 3	66 U.S. N	UCLEA	R REC	GULATORY	COMN	/1155	SION			APP	PRO	VED BY	OMB NO. 315	0-0104	EXPIR	ES 06/30/2001		
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TITLE	E (4)	ESF Actu	ation:	Invalio	d Automatic	Closu	ure o	of <b>E1150</b>	F008 R	esulting	g in S	huto	down C	Cooling Interru	ption				
EVENT DATE (5)			LER NUMBER (6) REPORT DATE (*					ATE (7)				OTHER FACI	LITIES	INVOLVED (8)					
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NAME				_								TELE	EPHONE N	UMBER (Include Area	a Code)				
H	Peter W.	Smith – Su	pervis	or, Co	mpliance									(734	) 586-4	271			
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At 0251 hours on April 17, 2000, the reactor was in Mode 5 with the vessel head removed, the reactor cavity filled with water, and the fuel pool gates removed. While removing Division 2 Core Spray from service for planned maintenance, operators removed power fuses to deenergize instrument power supply inverter E21K601B as directed by Safety Tagging Record (STR) 2000-000501. This inverter feeds one of two paralleled DC power supplies in panel H21P081. However, inverter R31K004, which feeds the other DC power supply, had previously been deenergized to support other activities. Therefore, when E21K601B was shutdown, the associated Division 2 instrumentation was deenergized, including the Reactor Steam Dome Pressure instrument loop which initiates the Shutdown Cooling System Isolation on Reactor Steam Dome Pressure – High. Deenergization of this loop initiated the automatic closure of E1150F008, Residual Heat Removal (RHR) Division 1 and 2 Shutdown Cooling Outboard Containment Isolation Valve, causing a trip of the operating RHR pump and a brief interruption of shutdown cooling. Once the cause of the isolation and pump trip was confirmed, power fuses for E21K601B were reinstalled and shutdown cooling was returned to operation. Shutdown cooling was interrupted for 21 minutes due to this isolation, however no change in reactor temperature was observed. This event occurred because proper power supply verification was not performed prior to shutting down inverter E21K601B.

NRC FORM 366A (6-1998)	U.S. NUCLEAR REGULATORY COMMISSION								
TEX	T CONTINUATION								
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TEXT (If more space is require	ed, use additional copies of NRC Form 366A) (17)								
Initial Plant Conditio	<u>ns:</u>								
Mode	5 (Refueling)								
Reactor Power	0 Percent								
Reactor Pressure									
Reactor Temperature	88 Degrees Fahrenheit								
Description of the Ev	ent:								

At 0251 hours on April 17, 2000, while removing Division 2 Core Spray [BM] from service for planned maintenance, operators (utility, non-licensed) removed power fuses to deenergize instrument power supply inverter [INVT] E21K601B (Core Spray Inverter) as directed by Safety Tagging Record (STR) 2000-000501. This Core Spray Inverter feeds one of two paralleled DC power supplies in panel H21P081 (power supply B21K609D) and one of two paralleled DC power supplies in panel H21P083 (power supply B21K610D) such that shutting down the Core Spray Inverter would not affect the associated instrumentation. However, inverter [INVT] R31K004, which feeds the other DC power supplies (B21K609B for H21P081 and B21K610B for H21P083), had previously been deenergized to support other activities, leaving the Core Spray Inverter as the only energized power supply for the associated Division 2 instrumentation. Therefore, when the Core Spray Inverter was shutdown, the associated Division 2 instrumentation was deenergized, including the Reactor Steam Dome Pressure instrument loop which initiates the Shutdown Cooling System [BO] Isolation on Reactor Steam Dome Pressure – High. Deenergization of this loop initiated the automatic closure of E1150F008, Residual Heat Removal (RHR) Division 1 and 2 Shutdown Cooling Outboard Containment Isolation Valve [BO][ISV], causing a trip of the operating RHR pump and a brief interruption of shutdown cooling. This isolation resulted from an invalid partial (outboard) Group 4 (Residual Heat Removal and Head Spray) isolation signal (Reactor Steam Dome Pressure – High) that occurred when the instrument loop was deenergized. The Head Spray valves were already closed at the time of this event, and the Residual Heat Removal (RHR) Division 1 and 2 Shutdown Cooling Inboard Containment Isolation Valve [BO][ISV], E1150F009, was unaffected by the outboard isolation signal.

The control room staff, responding to "Division 2 RHR Pump B/D Motor Tripped" alarm 2D45, entered the loss of shutdown cooling Abnormal Operating Procedure. Once the cause of the isolation and pump trip were confirmed, power fuses for the Core Spray Inverter were reinstalled and shutdown cooling was returned to operation. Shutdown cooling was interrupted for 21 minutes due to this isolation, and no change in reactor temperature was observed. At the time of this event, the reactor had been shutdown for more than two weeks; the reactor was in Mode 5 with the vessel head removed, the reactor cavity filled with water, and the fuel pool gates removed.

NRC FORM 366A (6-1998) LICENSE TI	U.S. NUCLEAR REGULATORY COMM E EVENT REPORT (LER) EXT CONTINUATION	IISSION							
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During preparation R31K004 was iden used to verify the st for preparation of the verification of these to this effect were i	of STR 2000-000501, the depetified. Power supply monitorin tatus of the paralleled power supplement of the paralleled power supplement of the stream of the	ndent role of the Core S g lights are available on pplies. However, limita of the STR from includi nergizing the Core Spray	pray Inv panels tions of ing a spe y Inverte	verte H211 the s ecific er. Iu	r (E21 P081 a softwa seque nstead,	K601B) a nd P083 t re in use a ntial step clarifying	nd in hat c at tha dire g con	ivert an b at tin cting nme	er e ie ș nts

It is primarily the responsibility of the Work Control Nuclear Assistant Shift Supervisor (WCNASS)(utility, licensed) to ensure that plant conditions are appropriate when releasing a STR. In this case, the WCNASS did not recognize that the tagging for the Core Spray Inverter was included in the overall Core Spray system STR. Combining the inverter tags with the rest of the system STR instead of using a separate STR contributed to this oversight.

The supervisor (utility, licensed) directing the Core Spray tag out was aware of the comment in the STR regarding verification of power supplies and had intended to cover it in his briefing for the evolution. However, verification of the power supply lights was not covered in the briefing.

As a result, verification of the power supplies did not occur prior to deenergizing the Core Spray Inverter. Since power supply inverter R31K004 had been previously removed from service under a different STR, deenergization of the Core Spray Inverter deenergized the associated instrument loops, initiating the isolation signal.

## Analysis of the Event:

At the time of this event, the reactor had been shutdown for more than two weeks; the reactor was in Mode 5 with the vessel head removed. The reactor cavity was filled with water greater than 20-feet, 6-inches above the top of the Reactor Pressure Vessel (RPV) flange, and the fuel pool gates were removed. Fuel pool cooling and cleanup system was in service, providing cooling for the spent fuel pool. No CORE ALTERATIONS, handling of irradiated fuel in secondary containment, or operations with a potential for draining the reactor vessel (OPDRVs) were in progress. In this condition, Technical Specification 3.9.7 requires one RHR shutdown cooling subsystem to be operable unless heat losses to ambient are greater than or equal to heat input to the reactor coolant. Continuous operation of RHR shutdown cooling is not required in this condition.

With the unit in MODE 5, the RHR System is not required to mitigate any events or accidents evaluated in the safety analyses. The RHR System is required for removing decay heat to maintain the temperature of the reactor coolant. Although the RHR System does not meet a specific criterion of the NRC Policy Statement, it was identified in 10 CFR 50.36(c)(2)(ii) as an important contributor to risk reduction. Therefore, the RHR System is retained as a Specification. Only one RHR shutdown cooling subsystem is required to be OPERABLE in MODE 5

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capability. Addi aligned (remote of intermittent) of c	tionally, each RHR shutdown cooling subs or local) in the shutdown cooling mode for one subsystem can maintain and reduce the	removal of dec reactor coolant	tered O cay heat t temper	PERA t. Ope rature	BLE eration as rec	if it can b in (either c juired.	e ma ontii	nual	ly s or
Shutdown coolin coolant temperat	g was interrupted for 21 minutes. During ure.	that time there	was no	obser	vable	increase i	n rea	actor	
This event result potential for caus	ed in no damage or degradation of plant str sing such damage or degradation.	ructures, system	ns, or co	ompor	nents a	and had n	o sig	nific	ant
Corrective Action	15:								

Operations personnel will be briefed on this event and its causes. This event was documented in the Fermi 2 corrective action program (CARD 00-11412). Further corrective actions are being considered, and will be developed and implemented commensurate with established priorities and processes of the Fermi 2 corrective action program. Additionally, CARD 00-15147 was written to initiate an overall evaluation of human performance issues during STR activities.

Additional Information:

A. Failed Component Data

None

## B. Previous Similar Events

LER 96-020-01 documents invalid isolation of the inboard Residual Heat Removal (RHR) Division 1 and 2 Shutdown Cooling Containment Isolation Valve, E1150F009, resulting in a brief interruption of shutdown cooling.