

A CMS Energy Company

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October 19, 2000

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT**  
LICENSEE EVENT REPORT 00-005, FAILURE TO PERFORM CHANNEL CHECK  
SURVEILLANCE ON CORE EXIT THERMOCOUPLES

Licensee Event Report (LER) 00-005 is attached. The LER describes the discovery that the required channel check surveillance on Core Exit Thermocouples had lapsed during five past shutdown periods without taking appropriate action required by Technical Specifications 3.17.4.6 and 3.17.4.4 upon subsequent startups. This discovery is reportable to the NRC pursuant to the requirement of 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.

  
Nathan L Haskell, Director  
Licensing and Performance Assessment

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

Attachment

TE22

**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 3

**TITLE (4)**  
FAILURE TO PERFORM CHANNEL CHECK SURVEILLANCE ON CORE EXIT THERMOCOUPLES

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
09	20	2000	2000	-- 005	-- 00	10	19	2000	FACILITY NAME	DOCKET NUMBER
										05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
N	100	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)**

<b>NAME</b>	<b>TELEPHONE NUMBER (Include Area Code)</b>
Sheri L. King, Sr. Technical Analyst	(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)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/>	NO					

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

On September 20, 2000 at approximately 1000 hours, the required channel check surveillance on Core Exit Thermocouples (CETs) was discovered to have lapsed during five previous shutdown periods, rendering the CETs inoperable. Upon subsequent startups, the plant failed to take appropriate action in accordance with Technical Specifications (TS) 3.17.4.6 and 3.17.4.4.

The channel check surveillance requirements were inappropriately incorporated into a procedure which is not performed before entering the applicable mode. This discrepancy was not recognized during subsequent reviews until discovery in September, 2000.

There were no safety consequences with this occurrence. While not performed prior to the startups, the channel check surveillance has been routinely performed on CETs during normal power operation in conformance with TS Table 4.17.4; therefore, the significance of the issue lies in TS compliance rather than safety consequences.

Both the procedure which implements this surveillance, and the surveillance test scheduling database, will be revised to align with Technical Specifications. A review of selected surveillance procedures will be completed to look for other potential inconsistencies between surveillance requirements and the corresponding implementing procedure.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET(2)	LER NUMBER (6)			PAGE
CONSUMERS ENERGY COMPANY PALISADES NUCLEAR PLANT	05000255	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2000	005	00	

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

**EVENT DESCRIPTION**

Core Exit Thermocouples (CETs) are Accident Monitoring Instruments consisting of four channels per core quadrant. Technical Specification (TS) 3.17.4.6 states that with two required channels of CETs inoperable, one channel must be restored to operable status within 48 hours. If TS 3.17.4.6 is not met, TS 3.17.4.4 requires the reactor to be placed in Hot Shutdown within 12 hours, and in a condition where the affected equipment is not required, within 48 hours. The channel check surveillance requirement for CETs must be completed every 31 days (+25%) in accordance with TS Table 4.17.4. Contrary to the above, on September 20, 2000 at approximately 1000 hours, the required channel check surveillance on CETs was discovered to have lapsed during five previous shutdown periods, rendering the CETs inoperable. Upon subsequent startups, the plant failed to take appropriate action in accordance with TS 3.17.4.6 and TS 3.17.4.4. Each of the identified occurrences is reportable to the NRC pursuant to the requirement of 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

**ANALYSIS OF THE EVENT**

In late 1993, responsibility for performance of the CET channel check surveillance transferred between departments. During the transition, the channel check surveillance requirements were inappropriately incorporated into a procedure which is not performed before entering the applicable mode, PCS temperature above 300 degrees F. Consequently, each time the plant entered the CET applicability mode, and the CET surveillance had not been completed during the previous 31 days (+25%), the plant did not take the appropriate action for having inoperable equipment as specified in TS 3.17.4.6 and TS 3.17.4.4. Five such occurrences during outage startup have been identified as follows: May/June, 1994; August, 1995; December, 1996; May/June, 1998; and, November/December, 1999.

The channel check surveillance has been routinely performed on the CETs during normal power operation.

**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	005	00	3 OF 3

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

**SAFETY SIGNIFICANCE**

There were no safety consequences with this occurrence. While not performed prior to the startups, the channel check surveillance has been routinely performed on the CETs during normal power operation in conformance with TS Table 4.17.4; therefore, the significance of the issue lies in TS compliance rather than safety consequences.

**CAUSE OF THE EVENT**

In late 1993, the channel check surveillance requirements were inappropriately incorporated into a procedure which is not performed before entering the applicable mode. This discrepancy was not recognized during subsequent reviews until discovery in September, 2000.

**CORRECTIVE ACTION**

Both the procedure which implements this surveillance, and the surveillance test scheduling database, will be revised to align with Technical Specifications.

A review of selected surveillance procedures will be completed to look for other potential inconsistencies between surveillance requirements and the corresponding implementing procedure.

**PREVIOUS SIMILAR EVENTS**

LER 00-001 Failure to Perform Technical Specification Surveillance of the Power Dependent Insertion Limit Alarm

LER 99-002 Technical Specification Surveillance Not Completed Within Specified Frequency

LER 99-001 Failure to Perform Technical Specification Surveillance Channel Check of Auxiliary Feedwater Flow Indication