



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001
October 13, 1995

Mr. Douglas R. Gipson
Senior Vice President
Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI-2 - ISSUANCE OF AMENDMENT RE: ONE-TIME DEFERRAL OF LIMITED ASPECTS OF CERTAIN SURVEILLANCE REQUIREMENTS (TAC NO. M93770)

Dear Mr. Gipson:

The Commission has issued the enclosed Amendment No. 105 to Facility Operating License No. NPF-43 for the Fermi-2 facility. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated October 2, 1995.

The amendment revises TS 4.3.3.2, 4.8.1.1.2.e.4.b, and 4.8.1.1.2.e.6.b to allow deferral until the first plant outage after September 29, 1995, for completion of the diesel generator output breaker logic system functional testing and completion of verification that 480-volt loads are energized through the diesel generator load sequencer.

Your October 2, 1995, letter requested that this amendment be processed on an emergency basis. The emergency exists in that failure of the Commission to act in a timely way would result in a shutdown of the unit. You were unable to make a more timely application because the missed aspects of the surveillances were only recently discovered during an independent review of overlap testing drawings developed by your staff per your commitments in Licensee Event Report (LER) 94-003-03, "Inadequate Logic Functional Test," dated March 17, 1995. As a result of this discovery, you declared all four diesel generators inoperable at 5:00 p.m. EDT on September 28, 1995. TS 4.0.3 allows an additional 24 hours to complete a missed surveillance; however, due to the nature of the surveillances, this was insufficient time to complete the surveillances. Therefore, the emergency situation occurred without prior indication and could not have been avoided.

You initially requested that the Commission exercise enforcement discretion in this matter in your letters of September 29, as revised October 2, 1995. Our letter of October 3, 1995, documented our exercise of enforcement discretion as indicated to your staff by telephone at 4:35 p.m. EDT on September 29, 1995.

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D. Gipson

- 2 -

A copy of our Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY

Timothy G. Colburn, Sr. Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-341

Enclosures: 1. Amendment No.105 to NPF-43
2. Safety Evaluation

cc w/encl: See next page

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DATED: October 13, 1995

AMENDMENT NO. 105 TO FACILITY OPERATING LICENSE NO. NPF-43-FERMI-2

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DETROIT EDISON COMPANY

DOCKET NO. 50-341

FERMI-2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 105
License No. NPF-43

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Detroit Edison Company (the licensee) dated October 2, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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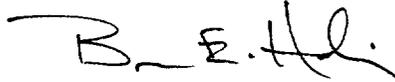
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-43 is hereby amended to read as follows:

Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 105, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. DECo shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance with full implementation within 45 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Brian E. Holian, Acting Director
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: October 13, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 105

FACILITY OPERATING LICENSE NO. NPF-43

DOCKET NO. 50-341

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

REMOVE

3/4 3-23
3/4 3-24*
3/4 8-5
3/4 8-6*

INSERT

3/4 3-23
3/4 3-24*
3/4 8-5
3/4 8-6*

*Overleaf page provided to maintain document completeness. No changes contained on these pages.

INSTRUMENTATION

3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3 The emergency core cooling system (ECCS) actuation instrumentation channels shown in Table 3.3.3-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2.

APPLICABILITY: As shown in Table 3.3.3-1.

ACTION:

- a. With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With one or more ECCS actuation instrumentation channels inoperable, take the ACTION required by Table 3.3.3-1.
- c. With either ADS trip system "A" or "B" inoperable, restore the inoperable trip system to OPERABLE status within:
 1. 7 days, provided that the HPCI and RCIC systems are OPERABLE, otherwise,
 2. 72 hours.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 150 psig within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each ECCS actuation instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION operations for the OPERATIONAL CONDITIONS and at the frequencies shown in Table 4.3.3.1-1.

4.3.3.2 LOGIC SYSTEM FUNCTIONAL TESTS and simulated automatic operation of all channels shall be performed at least once per 18 months.*

4.3.3.3 The ECCS RESPONSE TIME of each ECCS trip function shall be demonstrated to be within the limit at least once per 18 months. Each test shall include at least one channel per trip system such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific ECCS trip system.

* For the diesel generator output breakers: Completion of logic system functional testing, for the loss of power function, to positively verify that the breaker reclosure permissive relay (52XX) is re-energized by the associated bus load shedding logic contact closing, rather than the 52XX being re-energized by a parallel path, may be deferred and must be completed no later than during the first plant outage after September 29, 1995.

TABLE 3.3.3-1

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

| <u>TRIP FUNCTION</u> | <u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM(a)</u> | <u>APPLICABLE OPERATIONAL CONDITIONS</u> | <u>ACTION</u> |
|--|---|--|---------------|
| 1. <u>CORE SPRAY SYSTEM</u> | | | |
| a. Reactor Vessel Low Water Level - Level 1 | 2(b) | 1, 2, 3, 4*, 5* | 30 |
| b. Drywell Pressure - High | 2(b) | 1, 2, 3 | 30 |
| c. Reactor Steam Dome Pressure - Low (Injection Permissive) | 2 | 1, 2, 3 | 30 |
| | 2 | 4*, 5* | 30 |
| d. Manual Initiation | 1## | 1, 2, 3, 4*, 5* | 33 |
| 2. <u>LOW PRESSURE COOLANT INJECTION MODE OF RHR SYSTEM</u> | | | |
| a. Reactor Vessel Low Water Level - Level 1 | 2 | 1, 2, 3, 4*, 5* | 30 |
| b. Drywell Pressure - High | 2 | 1, 2, 3 | 30 |
| c. Reactor Steam Dome Pressure - Low (Valve Permissive) | 2 | 1, 2, 3 | 30 |
| | 2 | 4*, 5* | 30 |
| d. Reactor Vessel Low Water Level - Level 2 (Loop Select Logic) | 2 | 1, 2, 3, 4*, 5* | 30 |
| e. Reactor Steam Dome Pressure - Low (Break Detection Logic) | 2 | 1, 2, 3, 4*, 5* | 30 |
| f. Riser Differential Pressure - High (Break Detection) | 2 | 1, 2, 3 | 30 |
| g. Recirculation Pump Differential Pressure - High (Break Detection) | 2 | 1, 2, 3 | 30 |
| h. Manual Initiation | 1## | 1, 2, 3, 4*, 5* | 33 |
| 3. <u>HIGH PRESSURE COOLANT INJECTION SYSTEM##</u> | | | |
| a. Reactor Vessel Low Water Level - Level 2 | 2 | 1, 2, 3 | 30 |
| b. Drywell Pressure - High | 2 | 1, 2, 3 | 30 |
| c. Condensate Storage Tank Level - Low | 2(c) | 1, 2, 3 | 34 |
| d. Suppression Pool Water Level - High | 2(d) | 1, 2, 3 | 34 |
| e. Reactor Vessel High Water Level - Level 8 | 2(e) | 1, 2, 3 | 32 |
| f. Manual Initiation | 1## | 1, 2, 3 | 33 |

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying the diesel generator capability to reject a load of greater than or equal to 1666 kW while maintaining engine speed less than the nominal speed plus 75% of the difference between nominal speed and the overspeed trip setpoint or 115% of nominal speed, whichever is lower.
3. Verifying the diesel generator capability to reject a load of 2850 kW without tripping. The generator voltage shall not exceed 4784 volts during and following the load rejection.
4. Simulating a loss-of-offsite power by itself, and:
 - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
 - b) Verifying the diesel generator starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the autoconnected loads through the load sequencer* and operates for greater than or equal to 5 minutes while its generator is loaded with the shutdown loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test.
5. Verifying that on an ECCS actuation test signal, without loss-of-offsite power, the diesel generator starts on the auto-start signal and operates on standby for greater than or equal to 5 minutes. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds after the auto-start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test.
6. Simulating a loss-of-offsite power in conjunction with an ECCS actuation test signal, and:
 - a) Verifying deenergization of the emergency busses and load shedding from the emergency busses.
 - b) Verifying the diesel generator starts on the auto-start signal, energizes the emergency busses with permanently connected loads within 10 seconds, energizes the auto-connected shutdown loads through the load sequencer* and operates for greater than or equal to 5 minutes while its generator is loaded with the emergency loads. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz during this test.

* Completion of testing to verify the 480 volt loads listed in Detroit Edison letter to the NRC, NRC 95-0104 dated October 2, 1995, are energized through the load sequencer and not a parallel path may be deferred and must be completed no later than during the first plant outage after September 29, 1995.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

7. Verifying that all automatic diesel generator trips, except overspeed, generator differential, low lube oil pressure, crankcase overpressure, and failure to start are automatically bypassed for an emergency start signal.
8. Verifying the diesel generator operates for at least 24 hours. During the first 22 hours of this test, the diesel generator shall be loaded to greater than or equal to an indicated 2500-2600 kW and during the remaining 2 hours of this test, the diesel generator shall be loaded to an indicated 2800-2900 kW. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz within 10 seconds after the start signal; the steady-state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24-hour test, perform Surveillance Requirement 4.8.1.1.2.a.4).*
9. Verifying that the auto-connected loads to each diesel generator do not exceed the 2000-hour rating of 3100 kW.
10. Verifying the diesel generator's capability to:
 - a) Synchronize with the offsite power source while the generator is loaded with its emergency loads upon a simulated restoration of offsite power,
 - b) Transfer its loads to the offsite power source, and
 - c) Be restored to its standby status.
11. Verifying that the automatic load sequence timer is OPERABLE with the interval between each load block within $\pm 10\%$ of its design interval.
12. Verifying that the following diesel generator lockout features prevent diesel generator starting only when required:
 - a) 4160-volt ESF bus lockout.
 - b) Differential trip.
 - c) Shutdown relay trip.

*If Surveillance Requirement 4.8.1.1.2.a.4) is not satisfactorily completed, it is not necessary to repeat the preceding 24-hour test. Instead, the diesel generator may be operated at an indicated 2500-2600 kW for 2 hours or until operating temperature has stabilized.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 105 TO FACILITY OPERATING LICENSE NO. NPF-43

DETROIT EDISON COMPANY

FERMI-2

DOCKET NO. 50-341

1.0 INTRODUCTION

By letter dated October 2, 1995, the Detroit Edison Company (DECo or the licensee) requested an amendment to the Technical Specifications (TS) appended to Facility Operating License No. NPF-43 for Fermi-2. The proposed amendment would defer completion of certain aspects of TS 4.3.3.2, 4.8.1.1.2.e.4.b, and 4.8.1.1.2.e.6.b surveillances until the next plant outage after September 29, 1995. Specifically, the completion of emergency diesel generator output breaker logic system functional testing for the loss of power function, to positively verify that the breaker reclosure permissive relay (52XX) is re-energized by the associated bus load shedding logic contact closing, rather than the 52XX relay being re-energized by a parallel path, would be deferred until the next plant outage after September 29, 1995. Additionally, completion of testing to verify that the 480-volt emergency loads are energized through the load sequencer and not a parallel path would be deferred until the next plant outage after September 29, 1995.

2.0 BACKGROUND

TS surveillance 4.3.3.2 requires verifying that logic system functional tests and simulated automatic operation of all channels shall be performed at least once per 18 months. Loss of power (4160-volt bus loss or degraded voltage) is one of the functions that is tested as part of this surveillance requirement. The associated surveillance test procedure involves tripping the output breaker and verifying that the associated output breakers trip, initiating a load shed followed by the reclosure of the associated output breaker. The associated bus load shedding logic contacts close to re-energize the output breaker closing coil permissive relay (52XX). Closure of the 52XX relay contacts, coincident with other breaker closure signals, results in closure of the breaker. However, the testing does not verify that the parallel control room breaker closure switch (CMC) contacts, or the 52XX relay seal-in contacts, are not responsible for the re-energizing of the 52XX relay. The surveillance procedure has the CMC switch in the required position which should result in the CMC switch contact being open and the 52XX relay dropping out; however, there is no positive verification that these contacts are not in fact closed (i.e., stuck closed).

TS surveillances 4.8.1.1.2.e.4.b and 6.b require verifying that the diesel generator starts on the auto-start signal and energizes the emergency busses with automatically connected loads through the load sequencer. The associated surveillance test procedure involves verification that the auto-connected loads are running on the 480-volt emergency busses after the diesels automatically start. However, the testing does not verify that the automatic digital load sequencer system relays are responsible for actually connecting the associated loads. There are parallel control switch contacts and/or control relay contacts that could provide for immediate connection of the loads to the 480-volt emergency bus after diesel generator starting without a closure signal from the load sequencer system. The sequence of surveillance testing procedure steps establishes conditions to open these parallel contacts, but does not verify that the contacts are actually open.

3.0 EVALUATION

The 4160-volt ESF (engineered safety features) busses are equipped with undervoltage relaying. This relaying will initiate a load shed sequence to remove predetermined loads from the associated busses and initiate an emergency diesel generator auto-start. Once started, the diesel generator output breaker will close. Loading of the diesels is accomplished through the load sequencer to ensure that the required loads are re-energized and the diesels are not overloaded which could otherwise occur due to the combined starting currents of the loads. The logic associated with the undervoltage relaying, the loads and logic associated with the loss-of-offsite power, and the diesel generator starting logic were all last tested during the last refueling outage that ended in December 1994.

For the testing deficiencies associated with the diesel generator output breaker logic, the licensee stated that the function of the inadequately tested contacts is not needed (function bypassed) when the CMC switch in the control room is in its normally OPEN position. Any hypothetical failure of the subject contacts could have gone undetected during the last surveillance testing only if a parallel contact in the output breaker CMC switch or the 52XX relay would energize via the failed closed parallel contact(s) and provide the required breaker closing coil permissive logic.

The 52XX relay provides anti-pumping protection for the diesel generator output breaker. Anti-pumping is a feature of an electrically operated circuit breaker to prevent repeated closing and tripping (pumping) of the breaker after a breaker closure signal is initiated and the circuit breaker closes onto a fault. The licensee stated that for Fermi 2 circuit breakers, a shunt contact is connected across the 52XX relay coil such that the shunt contact closes whenever the circuit breaker closes, thereby shorting out the relay coil causing the relay to drop out. This resets the circuit breaker circuitry in preparation for a circuit breaker reclosure attempt in the event of a loss-of-offsite power. In the event that either the 52XX seal-in contact or the CMC switch "open" contact are welded in the closed position (the situation necessary to mask the undervoltage load shed contact surveillance test

function), there is no adverse impact on the diesel output breaker since the 52XX relay coil shunt contact configuration is unaffected. Therefore, there is no safety concern associated with the failure to have properly tested the subject contacts or with approval of the proposed action.

For the inadequately tested load sequencer contacts, the licensee stated that any hypothetical failure of the subject contacts could have gone undetected during the previous surveillance testing only if a parallel contact in the associated CMC control switch or a control relay contact had failed closed and had not been detected. If this had occurred, the licensee stated that the associated load would still function as needed because the logic pathway would be completed via the failed closed parallel contact(s) and the 480-volt emergency bus loads would load onto the bus when the diesel generator output breaker closes. In addition, the previous surveillance testing verified that the diesels were able to respond adequately to the connection of all loads, so that if there were any failed closed parallel contacts that were undetected, they did not have an adverse impact on the diesel function. For any individual 480-volt emergency load, if its associated parallel contact were welded closed, that load would immediately be loaded onto the diesel when the output breaker were closed, instead of being delayed in groups by the load sequencer for periods of 5 to 10 seconds.

The licensee confirmed that in the worst case, represented by the concurrent failure of all of the incompletely tested contacts (up to 15 individual contacts on 15 separate loads per diesel generator), approximately 185 hp (horsepower) of additional load could be loaded onto the most highly loaded diesel when the output breaker closes. The licensee's engineering evaluations have confirmed that the diesels are capable of accepting this additional load coincident with other loads being sequenced onto the diesels when the output breakers close.

The licensee also confirmed that the individual loads would not be adversely affected by the associated voltage drop and recovery time associated with a worst-case simultaneous loading of the emergency 480-volt loads. The voltage dip for a short period of time will not damage the individual components, motor-operated valves, and continuous duty motors that start when the diesel output breaker closes. The resulting individual component terminal voltage and overall recovery time are acceptable. The results of the licensee's evaluations indicate that all individual loads connected to the diesels would perform their required safety functions in the required time without adverse consequences. Therefore, there is no safety concern associated with the failure to have properly tested the subject contacts or with approval of the proposed action.

Additionally, the licensee performed a site-specific and industry failure history data search for similar relays and control switches. The results indicated that the overall failure rates were very low. The licensee has additionally committed to complete the surveillances at the next plant outage, regardless of duration. The licensee has also taken compensatory measures to alert operators of the significance of the missed surveillances and the proper control switch positions.

Based on the successful operation of the diesel generators during the previous surveillance and during monthly surveillance testing, the demonstrated low safety significance with the missed surveillances, and the low failure rates associated with similar relays and control switches, the staff finds the licensee's proposed request for deferral of certain aspects of the surveillance testing for the diesel output breaker reclosure circuitry and 480-volt load sequencer until the next plant outage to be acceptable.

4.0 EMERGENCY CIRCUMSTANCES

In its October 2, 1995, application the licensee requested that the amendment be treated as an emergency amendment because the Commission is currently exercising enforcement discretion with respect to the missed surveillances and failure to act would require an unnecessary plant shutdown. In accordance with 10 CFR 50.91(a)(5), the licensee provided the following information regarding why this emergency situation occurred and it could not avoid the situation.

At 5:00 p.m. EDT on September 28, 1995, all four emergency diesel generators were declared inoperable due to missed TS surveillance requirements due to incomplete control switch and relay contact position verification during surveillance testing.

DECo evaluated the situation and concluded that the potentially untested portions of the logic circuitry did not, and would not, prevent the surveillance testing from demonstrating that the emergency diesel generators are functional and would perform the safety functions if needed, and that there was no potential adverse impact on public health and safety. DECo requested and the Commission exercised enforcement discretion with respect to the missed surveillances to begin at 5:00 p.m. EDT on September 29, 1995, until an emergency TS change could be approved or as committed to by DECo, until the next plant outage during which time the surveillances would be completed. Had the Commission not exercised enforcement discretion, a reactor shutdown would have been required. To conduct the required surveillance testing, all four diesel generators would have to be removed from service sequentially to manipulate the associated output breaker closure switch. Additionally, various safety-related system components would have to be taken out of service to verify that the load sequencing control relay contacts are operating properly.

Electrical surveillance overlap drawings were created as a result of LER 94-003, "Inadequate Logic Functional Test." An independent review was performed in conjunction with the development of these overlap drawings. This review identified concerns of contact ambiguity regarding certain portions of the diesel generator output breaker and 480-volt load sequencer surveillance tests. These concerns were reviewed and found to be valid by Fermi 2 engineering personnel on September 28, 1995. The review determined that contacts in parallel with contacts to be functionally tested are not verified to be open. This could hypothetically result in a false satisfactory test of the contact function. The situation was a direct result of the review to improve surveillance testing documentation and because of the independent review requirements could not have been avoided. It is also a conservative

assumption that the hypothetical contact failures would mask otherwise apparently successful surveillance testing.

The licensee validated the contact ambiguity concerns, but because the affected surveillances were required to be completed during the previous refueling outage, the licensee declared all four diesel generators inoperable due to the missed portions of the surveillances. The licensee could not complete the surveillances in the additional 24 hours allowed by TS 4.0.3 for completion of missed surveillances. The Commission is currently exercising enforcement discretion with respect to the proposed surveillances. Lacking approval of the licensee's proposed amendment, the licensee would be required to shut down to complete the surveillances. Accordingly, the Commission has determined that there are emergency circumstances warranting prompt approval by the Commission pursuant to 10 CFR 50.91(a)(5).

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92(c) state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant hazards consideration because operation of the Fermi 2 facility in accordance with the proposed changes would not:

- (1) Involve an increase in the probability or consequences of an accident previously evaluated.

There is no change in the underlying Fermi 2 accident or transient analysis. The components for which testing is being deferred are not associated with any accident initiation mechanism. Further, testing that has been completed in conjunction with engineering analysis has shown that the diesel generators will still perform their safety function. Therefore, based on the above considerations, the staff concludes that the proposed testing deferral will not involve a significant increase in the probability or consequences of an accident previously evaluated.

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

The affected components are associated with components in the A.C. emergency power system. The system is normally not operating (i.e., in standby mode). Previous system testing has shown that the testing deferral of the affected components will not affect the initiation of this standby system. Further, as explained previously, if an affected component had failed during the previous surveillance in such a way that the failure would have been masked, the system would still function as needed because the function would be powered through the failed closed parallel contacts. The licensee's engineering analysis has also shown that subsequent worst-case concurrent failure of untested load sequencer contacts would not adversely affect operation of the diesel. The proposed changes also do not affect normal plant operation. Therefore, based on the above considerations, the staff concludes that the proposed testing deferral does not create the possibility of a new or different kind of accident from any accident previously evaluated.

(3) Involve a significant reduction in a margin of safety.

The proposed changes have no impact on safety analyses assumptions. The proposed changes do not alter the ability of the emergency A.C. power system to respond and perform its function nor do the proposed changes affect any instrument setpoints or design margins. The previous surveillance testing in conjunction with engineering analysis and the low failure rate of the untested components demonstrate that the diesel generators can perform their safety function. Therefore, based on the above considerations, the staff concludes that the proposed testing deferral does not involve a significant reduction in a margin of safety.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final no significant hazards consideration determination with respect to this amendment. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

8.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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