

December 19, 2002

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

**DOCKET 50-255**  
**LICENSE DPR-20**  
**PALISADES NUCLEAR PLANT**  
LICENSEE EVENT REPORT 02-001, NONCOMPLIANCE WITH TECHNICAL  
SPECIFICATION REQUIREMENTS FOR SAFETY INJECTION TANK T-82D

Licensee Event Report (LER) 02-001 is attached. The LER describes exceeding the action completion time specified by Technical Specification 3.5.1, Condition B, for an inoperable safety injection tank. A request for enforcement discretion had been granted to allow for this condition.

This condition is reportable 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  
Site Vice-President, Palisades

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

Attachment

IE22

**LICENSEE EVENT REPORT (LER)**

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

<b>1. FACILITY NAME</b> PALISADES NUCLEAR PLANT	<b>2. DOCKET NUMBER</b> 05000255	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
NONCOMPLIANCE WITH TECHNICAL SPECIFICATION REQUIREMENTS FOR SAFETY INJECTION TANK T-82D

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
11	12	2002	2002	001	00	12	19	2002	FACILITY NAME	DOCKET NUMBER
										05000
										05000

<b>9. OPERATING MODE</b> 1	<b>10. POWER LEVEL</b> 60	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR : (Check all that apply)</b>								
		20 2201(b)	20 2203(a)(3)(ii)	50.73(a)(2)(ii)(B)	50 73(a)(2)(ix)(A)					
		20 2201(d)	20 2203(a)(4)	50.73(a)(2)(iii)	50 73(a)(2)(x)					
		20 2203(a)(1)	50 36(c)(1)(i)(A)	50 73(a)(2)(iv)(A)	73 71(a)(4)					
		20 2203(a)(2)(i)	50.36(c)(1)(ii)(A)	50 73(a)(2)(v)(A)	73 71(a)(5)					
		20 2203(a)(2)(ii)	50.36(c)(2)	50 73(a)(2)(v)(B)	OTHER	Specify in Abstract below or in NRC Form 366A				
		20 2203(a)(2)(iii)	50.46(a)(3)(ii)	50 73(a)(2)(v)(C)						
		20 2203(a)(2)(iv)	50 73(a)(2)(i)(A)	50 73(a)(2)(v)(D)						
		20.2203(a)(2)(v)	X 50 73(a)(2)(i)(B)	50 73(a)(2)(vii)						
		20.2203(a)(2)(vi)	50 73(a)(2)(i)(C)	50 73(a)(2)(viii)(A)						
		20.2203(a)(3)(i)	50 73(a)(2)(ii)(A)	50 73(a)(2)(viii)(B)						

12. LICENSEE CONTACT FOR THIS LER	
NAME Amy C. Hazelhoff, Licensing Engineer	TELEPHONE NUMBER (Include Area Code) (269) 764-3042

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT									
CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

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

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

On November 11, 2002, at approximately 1339 hours, with the plant operating at 100% power, operations noted apparent leakage from safety injection tank T-82D via trending of multiple plant parameters. Subsequently, non-isolable leakage from safety injection tank T-82D was observed visually. Safety injection tank T-82D was declared inoperable at 1345 hours on November 11, 2002.

Nuclear Management Company, LLC requested enforcement discretion to extend the completion time for Technical Specification 3.5.1, Condition B, by 24 hours, for a total of 48 hours, to allow for restoration of safety injection tank T-82D to operable status. The Nuclear Regulatory Commission verbally exercised discretion at 1332 hours on November 12, 2002. Nuclear Management Company reduced plant power to approximately 60% and performed the required repairs to safety injection tank T-82D, which was subsequently declared operable at 0906 on November 13, 2002.

This occurrence is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications, since safety injection tank T-82D was not restored to operable status within the 24 hours allowed by Technical Specification 3.5.1, Condition B.

**LICENSEE EVENT REPORT (LER)**

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE	
PALISADES NUCLEAR PLANT	05000255	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3	
		2002	- 001	- 00		

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

**EVENT DESCRIPTION**

On November 11, 2002, at approximately 1339 hours, with the plant operating at 100% power, operations noted apparent leakage from safety injection tank T-82D [TK; BP] via trending of multiple plant parameters. Subsequently, safety injection tank T-82D and associated piping were visually inspected for evidence of leakage. During this inspection, leakage was visually observed from the 3/4" piping side of the sock-o-let attaching the lower sensing line for level transmitter LT-0374 [LT; BP] to the main 12" downcomer from safety injection tank T-82D. This joint leak was non-isolable from safety injection tank T-82D. Safety injection tank T-82D was declared inoperable at 1345 hours on November 11, 2002, and Condition B of Technical Specification 3.5.1 was entered.

Palisades Technical Specification 3.5.1, "Safety Injection Tanks," requires four safety injection tanks to be operable in Modes 1 and 2. Condition B of Technical Specification 3.5.1 requires an inoperable safety injection tank be restored to operable status within 24 hours. In the event that the required action and associated completion time of Condition B are not met, Condition C provides further required actions to be in Mode 3 within 6 hours.

Nuclear Management Company, LLC requested enforcement discretion to extend the completion time for Technical Specification 3.5.1, Condition B, by 24 hours, for a total of 48 hours, to allow for restoration of safety injection tank T-82D to operable status. The Nuclear Regulatory Commission verbally exercised discretion at 1332 hours on November 12, 2002. Nuclear Management Company reduced plant power to approximately 60% and performed the required repairs to safety injection tank T-82D, which was subsequently declared operable at 0906 on November 13, 2002.

This occurrence is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications, since safety injection tank T-82D was not restored to operable status within the 24 hours allowed by Technical Specification 3.5.1, Condition B.

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

**CAUSE OF THE EVENT**

The action completion time of Technical Specification 3.5.1, Condition B was knowingly exceeded under an approved Notice of Enforcement Discretion.

**SAFETY SIGNIFICANCE**

Extension of the allowed outage time was evaluated from a probabilistic risk standpoint. The risk associated with maintaining the reactor at power for an additional 24 hours with safety injection tank T-82D inoperable was determined to be lower than the risk associated with performing a reactor shutdown.

**CORRECTIVE ACTIONS**

Required repairs were made to restore safety injection tank T-82D to operable status.

A license amendment was not required because the plant was returned to compliance with the existing license in a short period of time.

**PREVIOUS SIMILAR EVENTS**

The root cause of the safety injection tank T-82D level-sensing line joint failure was determined to be high-cycle fatigue. The same joint failed in 1992. The root cause was believed to be a manufacturing defect. However, re-examination of the previous failure, along with the information from the recent failure, indicates that the failure mechanism for both failures was high-cycle fatigue.

**PREVIOUS LERs**

None