



December 17, 2004

10 CFR 50.73(a)(2)(i)(B)

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

Palisades Nuclear Plant
Docket 50-255
License No. DPR-20

Licensee Event Report 04-003, Main Steam Safety Valves Exceeded Lift Setpoint Acceptance Band

Licensee Event Report (LER) 04-003 is enclosed. The LER describes the discovery that multiple main steam safety valve as-found lift pressures exceeded the lift setpoint acceptance band. This occurrence is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

Summary of Commitments

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

Daniel J. Malone
Site Vice President, Palisades Nuclear Plant
Nuclear Management Company, LLC

Enclosure (1)

CC Administrator, Region III, USNRC
Project Manager, Palisades, USNRC
Resident Inspector, Palisades, USNRC

ENCLOSURE 1

**LER 04-003, MAIN STEAM SAFETY VALVES
EXCEEDED LIFT SETPOINT ACCEPTANCE BAND**

4 Pages Follow

LICENSEE EVENT REPORT (LER)

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

Estimated burden per response to comply with this mandatory collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0066), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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)

Palisades Nuclear Plant

DOCKET NUMBER (2)

05000-255

PAGE (3)

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TITLE (4)

Main Steam Safety Valves Exceeded Lift Setpoint Acceptance Band

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MO	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO	MO	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	23	2004	2004	-- 003 --	00	12	17	2004	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		6		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 101: (Check all that apply) (11)						
POWER LEVEL (10)		0%		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)		

LICENSEE CONTACT FOR THIS LER (12)

NAME: Daniel G. Malone
TELEPHONE NUMBER (Include Area Code): (269) 764-2463

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
X	SB	RV	C710	Y					

SUPPLEMENTAL REPORT EXPECTED (14)

X YES (If yes, complete EXPECTED SUBMISSION DATE). NO
EXPECTED SUBMISSION DATE (15): 04 01 2005

ABSTRACT

Testing of main steam safety valves revealed a total of 11 out of 24 unsatisfactory as-found lift pressure tests. All of the unsatisfactory as-found lift pressures were above the acceptance band.

Technical Specification Limiting Condition For Operation (LCO) 3.7.1 requires a minimum of 23 out of 24 main steam safety valves to be operable in modes 1, 2 and 3. Since the cause of the multiple unsatisfactory as-found lift pressures may have arisen over a period of time, there is a likelihood that all of the required main steam safety valves were not operable during past plant operation. Therefore, this occurrence is considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

The cause of the occurrence has not been confirmed. However, the most probable cause, based on industry experience, is disc/seat sticking. Additionally, potential valve spindle binding at the upper guide bearing is being investigated.

Final lift pressures were established in accordance with requirements. Further corrective actions are to be determined.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

EVENT DESCRIPTION

On October 23, 2004, with the plant in mode 6, offsite testing of main steam safety valve RV-0706 [SB;RV] determined that the as-found lift pressure did not meet the acceptance band of +/- 3% of setpoint, as specified by Technical Specification Table 3.7.1-1, "Main Steam Safety Valve Lift Settings." This was the second unsatisfactory as-found lift pressure for a main steam safety valve, as in-place testing on September 16, 2004, had previously determined that RV-0710 had failed to meet the as-found acceptance band.

Subsequently, continued testing both offsite, and later, in-place after the plant had been returned to power operation, revealed 9 more unsatisfactory main steam safety valve as-found lift pressure tests, for a total of 11 out of 24 unsatisfactory as-found tests. See Table 1 for additional data on the unsatisfactory as-found lift pressure results. All of the unsatisfactory as-found lift pressures were above the acceptance band.

Technical Specification LCO 3.7.1 requires a minimum of 23 out of 24 main steam safety valves to be operable in modes 1, 2 and 3. Since the cause of the multiple unsatisfactory as-found lift pressures may have arisen over a period of time, there is a likelihood that all of the required main steam safety valves were not operable during past plant operation. Therefore, this occurrence is considered reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

CAUSE OF THE EVENT

The cause of the occurrence has not been confirmed. However, the most probable cause based on industry experience is disc/seat sticking. Industry experience has shown that sticking may be identified by the as-found lift pressure being approximately 30 psi higher than a second lift pressure when re-tested. All 11 of the unsatisfactory test results exhibited a significant reduction in lift pressure on the second lift, indicating potential disc/seat sticking. Also, based on the second lift, all 11 of the unsatisfactory main steam safety valves would have either met the as-found acceptance band, or in two cases, lifted below the acceptance band.

Additionally, potential valve spindle binding at the upper guide bearing is being investigated.

Evaluation of the cause is incomplete at this time and will be provided in a supplemental report.

SAFETY SIGNIFICANCE

The safety significance of this occurrence is believed to be minimal. However, analysis of past operability is incomplete at this time and will be provided in a supplemental report.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

CORRECTIVE ACTIONS

Final lift pressures were established in accordance with requirements. Further corrective actions are to be determined.

PREVIOUS SIMILAR EVENTS

Palisades Licensee Event Report 86-004, "Main Steam Relief Valves Fail To Meet 'As Found' Pressure Acceptance Criteria"

Palisades Licensee Event Report 83-074, "Valves Failed To Meet 'As Found' Acceptance Criteria"

Palisades Licensee Event Report 78-002, (not titled)

TABLE 1

Valve	Steam Generator A or B	As-Found Setpoint Acceptance Criteria	As-Found Setpoint	% Deviation	Second Lift	Tested In Place or Removed	Date Tested
RV-0704	A	1025 psig (995.3 to 1054.7)	1146.3	11.8	1017.6	Installed	12/2/04
RV-0706	A	1025 psig (995.3 to 1054.7)	1083	5.65	990	Removed	10/23/04
RV-0707	B	1025 psig (995.3 to 1054.7)	1058	3.22	998	Removed	10/24/04
RV-0710	B	1005 psig (975.9 to 1034.1)	1037.4	3.22	990.2	Installed	9/16/04
RV-0712	B	1005 psig (975.9 to 1034.1)	1039.3	3.41	999.5	Installed	12/9/04
RV-0713	A	1005 psig (975.9 to 1034.1)	1079.8	7.44	1004	Installed	12/3/04
RV-0714	A	1005 psig (975.9 to 1034.1)	1061.2	5.59	1006.6	Installed	12/3/04
RV-0716	A	1005 psig (975.9 to 1034.1)	1077.9	7.25	989	Installed	12/8/04
RV-0717	A	985 psig (956.4 to 1013.6)	1020.5	3.6	969.2	Installed	12/8/04
RV-0718	A	985 psig (956.4 to 1013.6)	1027.8	4.35	984.8	Installed	12/8/04
RV-0720	B	985 psig (956.4 to 1013.6)	1017.8	3.33	969.1	Installed	12/9/04