NMC
Committed to Nuclear Excellence

Palisades Nuclear Plant
Operated by Nuclear Management Company, LLC

May 24, 2005

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 05-003, Positive Differential Pressure Not Maintained Between Control Room Envelope and Adjacent Room

Licensee Event Report (LER) 05-003 is enclosed. The LER describes the discovery that Technical Specification SR 3.7.10.4 has not been fully met for each adjacent area to the control room envelope, in particular, the electrical equipment room.

This 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.

for

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

IE22

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ENCLOSURE 1

LER 05-003, Positive Differential Pressure Not Maintained Between Control Room Envelope and Adjacent Room

3 Pages Follow

NRC FORM 366 (6-2004) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 6-30-2007

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.

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TITLE (4)

Positive Differential Pressure Not Maintained Between Control Room Envelope and Adjacent Room

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
04	13	2005	2005	-- 003 --	00	05	24	2005	FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	1
POWER LEVEL (10)	100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR []: (Check all that apply) (11)

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

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX

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

ABSTRACT

On April 13, 2005, with the plant operating at approximately 100% power, a review of test data determined that, contrary to Technical Specification (TS) SR 3.7.10.4, a positive differential pressure of >/= 0.125 inches water gauge was not being maintained between the control room envelope (CRE) and the adjacent electrical equipment room (EER), when the control room ventilation system (CRV) was operating in emergency mode. Additionally, review of the surveillance procedure that is periodically performed to demonstrate compliance with the 18-month frequency of TS SR 3.7.10.4, revealed that the differential pressure between the CRE and the EER is not specifically measured.

Consequently, for greater than the past three years, TS SR 3.7.10.4 has not been fully met with regard to demonstrating that the CRV can maintain a positive pressure of >/= 0.125 inches water gauge relative to the EER.

This is reportable in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications.

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

EVENT DESCRIPTION

On April 13, 2005, with the plant operating at approximately 100% power, a review of test data determined that, contrary to Technical Specification (TS) SR 3.7.10.4, a positive differential pressure of >/= 0.125 inches water gauge was not being maintained between the control room envelope (CRE) and the adjacent electrical equipment room (EER), when the control room ventilation system (CRV) [VI] was operating in emergency mode. Additionally, review of the surveillance procedure that is periodically performed to demonstrate compliance with the 18-month frequency of TS SR 3.7.10.4, revealed that the differential pressure between the CRE and the EER is not specifically measured.

Consequently, for greater than the past three years, TS SR 3.7.10.4 has not been fully met with regard to demonstrating that the CRV can maintain a positive pressure of >/= 0.125 inches water gauge relative to the EER.

This is 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

During the week ending April 9, 2005, special testing of the CRV was performed using a tracer gas to directly measure unfiltered in-leakage into the CRE. Additionally, static pressure was measured within the CRE, and adjacent ventilated spaces. A high static pressure condition was identified in the EER. An inspection of the EER was performed, which determined that the elevated static pressure was caused by the lack of a return air flow path.

A review of plant design documents was performed to determine the intended configuration of the EER ventilation. The EER is supplied with ducted air from the switchgear and cable spreading room ventilation system. Return air from the EER was designed as non-ducted through the open doorway to the 1-D switchgear room. The door was originally restrained in the open position with a fusible link. An unrecognized change in the design configuration occurred in 1989, when the door between the EER and the 1-D switchgear room was closed. With air being supplied to the EER, but with no path for return air, a high static pressure condition was created, which could not be overcome by the CRV to maintain the TS required positive pressure of >/= 0.125 inches water gauge relative to the EER.

A surveillance procedure confirms that the differential pressure between the CRE and the 1-D switchgear room is >/= 0.125 inches water gauge, but does not specifically measure the differential pressure between the CRE and the EER, due to the assumption that there is no differential pressure between the 1-D switchgear room and the EER. This assumption would only be valid with the door between the 1-D switchgear room and the EER open.

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

SAFETY SIGNIFICANCE

The tracer gas testing that was performed during the week ending April 9, 2005, verified that the unfiltered in-leakage to the CRE was within acceptable limits, despite the CRE not being maintained at a positive differential pressure of >/= 0.125 inches water gauge relative to the EER. Therefore, the occurrence has minimal safety significance.

CORRECTIVE ACTIONS

Upon discovery, both CRV filtration trains were considered inoperable, and TS LCO Condition 3.7.10.F was determined to be applicable. TS LCO 3.0.3 was entered and immediate action was taken to reduce the high static pressure condition in the EER, by blocking open the door between the EER and the 1-D switchgear room, to allow a return air flow path from the EER to the 1D switchgear room.

Subsequent to this action, the CRV was operated in emergency mode and measurements were performed that verified that the differential pressure between the EER and the 1-D switchgear room was neutral. Therefore, the CRE was determined to be at a positive pressure of >/= 0.125 inches water gauge relative to each of these rooms. TS LCO 3.0.3 was then exited.

A work order has been initiated to restore the door to its original design configuration.

PREVIOUS SIMILAR EVENTS

None