June 7, 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 05-004, Fuel Handling Area Ventilation System Not Properly Aligned During Movement of Irradiated Fuel Assemblies

Licensee Event Report (LER) 05-004 is enclosed. The LER describes the discovery that the fuel handling area ventilation system was not aligned in accordance with Technical Specification 3.7.12.

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

ENCLOSURE 1

LER 05-004, Fuel Handling Area Ventilation System Not Properly Aligned During Movement of Irradiated Fuel Assemblies

3 Pages Follow

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

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

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.

LICENSEE EVENT REPORT (LER)

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

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TITLE (4)

Fuel Handling Area Ventilation System Not Properly Aligned During Movement of Irradiated Fuel Assemblies

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	18	2005	2005	-- 04 --	00	06	07	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 18, 2005, with the plant operating at approximately 100% power, it was determined that plant procedures do not ensure that the fuel handling area ventilation system is aligned in accordance with Technical Specification (TS) 3.7.12, during the specified applicability conditions.

Subsequent evaluation of the previous three years identified two periods when TS 3.7.12 was not met. This occurred during core alterations and movement of irradiated fuel assemblies when irradiated fuel assemblies were present with < 30 days decay time. The two periods were each less than one week in duration and occurred in the Spring 2003, and Fall 2004, refueling outages.

TS 3.7.12 was not met due to having more than the one specified exhaust fan in operation, aligned to the emergency filter bank, and also due to operating additional exhaust and supply fans in the fuel handling area ventilation system.

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

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

EVENT DESCRIPTION

On April 18, 2005, with the plant operating at approximately 100% power, it was determined that plant procedures do not ensure that the fuel handling area ventilation system [VG] is aligned in accordance with Technical Specification (TS) 3.7.12, during the specified applicability conditions.

Subsequent evaluation of the previous three years identified two periods when TS 3.7.12 was not met. This occurred during core alterations and movement of irradiated fuel assemblies when irradiated fuel assemblies were present with < 30 days decay time. The two periods were each less than one week in duration and occurred in the Spring 2003, and Fall 2004, refueling outages.

TS 3.7.12 specifies that the fuel handling area ventilation system shall be operable, and in operation with one fuel handling area exhaust fan aligned to the emergency filter bank. The basis for TS 3.7.12 clarifies the intended ventilation system configuration as having all ventilation fans stopped, except for one exhaust fan operating, which is aligned to the emergency filter bank.

TS 3.7.12 was not met due to having more than the one specified exhaust fan in operation, aligned to the emergency filter bank, and also due to operating additional exhaust and supply fans in the fuel handling area ventilation system.

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

The fuel handling area ventilation requirements, as currently specified by TS 3.7.12, were implemented in October 2000, as part of a major change from plant custom Technical Specifications to Improved Technical Specifications (ITS). Although this change was characterized as a more restrictive change at the time of ITS implementation, the specific change in wording that limited the ventilation system configuration to operation of only one exhaust fan was apparently overlooked.

SAFETY SIGNIFICANCE

This occurrence is of minimal safety significance.

The bounding fuel handling accident is assumed to occur in the containment building with no credit for containment isolation or for filtration of released fission products. Analysis has shown that the offsite dose resulting from this event is within the guidelines of 10 CFR 100.

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

The consequences of a fuel handling accident in the fuel handling area are acceptable either with, or without the emergency filter bank in operation, since these consequences are no more severe than the consequences of the bounding fuel handling accident occurring in the containment building. However, filtration through the emergency filter bank provides a significant reduction in offsite dose.

The procedure for responding to a fuel handling accident directs that the fuel handling area ventilation system be aligned in accordance with TS 3.7.12, with only one exhaust fan operating through the emergency filter bank, and with all other system supply and exhaust fans secured. Therefore, following a postulated fuel handling accident, the correct fuel handling area ventilation system alignment would have been assured.

CORRECTIVE ACTIONS

Plant procedures will be revised to ensure that the fuel handling area ventilation system is aligned to correctly implement TS 3.7.12.

PREVIOUS SIMILAR EVENTS

Palisades Licensee Event Report 99-005, Charcoal Filter Not In Service During Movement Of Irradiated Fuel Assemblies