Fermi 2
6400 North Dixie Hwy., Newport, MI 48166

Detroit Edison

TS 5.6.7

October 5, 2012
NRC-12-0065

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Post Accident Monitoring Report

As required by Fermi 2 Technical Specifications (TS), Detroit Edison hereby submits a Post Accident Monitoring (PAM) Report for one required channel of PAM instrumentation inoperable.

Fermi 2 TS 5.6.7 requires submittal of a PAM Report within 14 days after entry into Condition B of TS Limiting Condition for Operation (LCO) 3.3.3.1, "PAM Instrumentation." Condition B of TS LCO 3.3.3.1 was entered on September 26, 2012.

The PAM Report for this condition is provided in the enclosure to this letter.

There are no new commitments included in this document.

Should you have any questions or require additional information, please contact Zackary W. Rad, Manager - Nuclear Licensing at (734) 586-5076.

Sincerely,

James T. Conner
Site Vice President

Enclosure: Post Accident Monitoring Report Regarding Inoperable Instrumentation

cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 4, Region III
Regional Administrator, Region III
Supervisor, Electric Operators,
Michigan Public Service Commission

Enclosure to
NRC-12-0065

Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43

Post Accident Monitoring Report Regarding Inoperable Instrumentation

Post Accident Monitoring Report Regarding Inoperable Instrumentation

Fermi 2 Technical Specification (TS) Limiting Condition for Operation (LCO) 3.3.3.1, "PAM Instrumentation," requires one channel of Primary Containment Isolation Valve (PCIV) position indication in the control room to be operable for each Regulatory Guide 1.97 active PCIV in a containment penetration flow path, i.e., two total channels of PCIV position indication for a penetration flow path with two active valves. The PCIV position indication Post Accident Monitoring (PAM) instrumentation consists of valve mounted limit switches, wiring, cabling, and control room indicating lamps.

Fermi 2 TS 5.6.7 requires submittal of a PAM Report within 14 days after entry into Condition B of TS LCO 3.3.3.1, "PAM Instrumentation." Condition B of TS LCO 3.3.3.1 was entered on September 26, 2012.

This condition was entered due to the discovery that the cable connector assemblies associated with the PCIV position indication limit switches for the inboard Reactor Water Sample System valve, B3100-F019, had reached their Environmentally Qualification (EQ) life. The inboard PCIV position indication was declared inoperable on August 27, 2012. This inoperability resulted in entering Condition A of TS 3.3.3.1 for one PCIV position out of two required channels per penetration flow path inoperable, which requires restoration of the inoperable PAM instrumentation channel to operable within 30 days; otherwise, Condition B is entered.

The ¾ inch B3100-F019 PCIV provides inboard isolation for the Reactor Water Sample System small bore sample line. The outboard PCIV, B3100-F020, for this penetration, remains operable and continues to provide EQ position indication and isolation capability. Both the B3100-F019 and B3100-F020 are normally closed valves and receive isolation signals on low reactor water level, high drywell pressure and high main steam line radiation. Therefore, continued operation with this condition does not impose additional significant risk to the health and safety of the public. Although the position indicating limit switches are currently fully functional, the absence of supporting documentation in the EQ program no longer supports operability based on the worst post-accident environmental profile.

Cause of the Inoperabilty

The requirements of an EQ Maintenance and Surveillance (M&S) program were not correctly incorporated into the technical requirements of the Preventive Maintenance (PM) Event in 1994. The PM Event basis did not address the entire boundary of the limit switch EQ in the scope of the PM event. This omission of critical information in the PM event basis resulted in the failure to perform periodic replacement of the limit switch cable connector assemblies.

Action Taken

The non-qualified cable connector assemblies were entered into the corrective action program and a work order has been created to schedule replacement when plant conditions allow access to the cable connector assemblies in the primary containment. Additionally, the PM procedure is being revised to require reviews by an EQ subject matter expert.

Plans and Schedule

Replacement of the cable connector assemblies is planned for the sixteenth refueling outage (RF16), currently scheduled for the first quarter of 2014.