Consumers Power
POWERING MICHIGAN'S PROGRESS
Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

Thomas J. Palmisano
Plant General Manager

February 21, 1997

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
LICENSEE EVENT REPORT 97-002 - FAILURE TO MEET TECHNICAL SPECIFICATIONS 4.5.2d(1)(b) FOR TESTING OF THE EMERGENCY ESCAPE AIR LOCK

Licensee Event Report 97-002 is attached. This event is reportable in accordance with 10 CFR Part 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.

Thomas J. Palmisano
Plant General Manager

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

Attachment

IE22

030100

NRC FORM 366 (4/95) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 4/30/98

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

LICENSEE EVENT REPORT (LER)

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

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TITLE (4) LICENSEE EVENT REPORT 97-002 - FAILURE TO MEET TECHNICAL SPECIFICATIONS 4.5.2d(1)(b) FOR TESTING OF THE EMERGENCY ESCAPE AIRLOCK

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER 05000
01	23	97	97	002	00	02	21	97	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§: (Check one or more) (11)							
POWER LEVEL (10)	99.6		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(iii)
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Charles S. Kozup, Licensing Engineer	(616) 764-2000

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

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

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

On January 23, 1997, the plant was operating at 99.6% power. During the preparation of the Palisades Improved Technical Specifications, it was recognized that Palisades was not in compliance with the Technical Specification Surveillance requirement 4.5.2d(1)(b) for the emergency escape air lock. At 1528 on January 23, 1997, the emergency escape air lock was declared inoperable and Technical Specification 4.0.3 was entered due to the missed surveillance.

At 1010 on January 24, 1997, the emergency escape air lock testing was completed and the emergency escape air lock was declared operable. This testing restored compliance with Technical Specifications.

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

EVENT DESCRIPTION

On January 23, 1997, the plant was operating at 99.6% power. During the preparation of the Palisades Improved Standard Technical Specifications, it was recognized that Palisades was not in compliance with the Technical Specification Surveillance requirement 4.5.2d(1)(b), for the emergency escape air lock. This paragraph requires "...a reduced pressure test for the door seals or a full air lock penetration test shall be performed within 72 hours after either each air lock door opening...." At 1528 on January 23, 1997, the emergency escape air lock was declared inoperable and Technical Specification 4.0.3 was entered due to the missed surveillance. Technical Specification 4.0.3 allows for a delay up to 24 hours to complete the surveillance prior to taking the required technical specification action. The emergency escape air lock was tested to restore compliance with Technical Specifications and declared operable at 1010 on January 24, 1997. This testing restored compliance with Technical Specifications.

The Palisades emergency escape air lock does not provide the capability to perform unrestrained between-the-seals tests. In our Licensee Event Report 87-026, dated September 21, 1987, we stated that we would perform a seal contact inspection and adjustment after every strongback removal. The practice at Palisades has been to reopen the outer door to gain access to the inner door to remove the strongbacks needed to perform the full air lock testing. In addition, the inner door is opened and both the inner and the outer door seals are inspected and adjusted if necessary to ensure seal contact after the test.

On April 21, 1989, the NRC issued a violation to Palisades for failing to test the emergency escape air lock doors within three (3) days of opening the door. On May 22, 1989, we responded to the Notice of Violation and explained our position. On June 30, 1989, we submitted our written documentation regarding the equivalency of a seal contact check to a between-the-seals test. In this submittal, we explained our plans to continue to use the present methods for emergency escape air lock testing.

On June 1, 1989, the NRC approved a Technical Specification change request, which made the 10 CFR 50, Appendix J, testing requirements a part of Technical Specifications. At that time, it was not recognized that the failure to pressure test as specified in Appendix J then became a Technical Specification violation in addition to being a violation of Appendix J.

A Technical Specification change request which requested approval of our current practices was submitted on March 25, 1991, but was withdrawn on July 29, 1991. On January 10, 1996, the Technical Specification change request was resubmitted with a Request for Exemption from 10 CFR 50 Appendix J.

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

CAUSE OF THE EVENT

The cause of this event was that in 1989, the Palisades personnel did not recognize that continuing the testing practices that were in place had become a violation of the Technical Specifications when the June 1, 1989, Technical Specification Amendment on containment penetration testing was issued by the NRC. This oversight occurred because the issues associated with the emergency escape air lock had been discussed previously with the NRC, and we believed we were technically justified in our approach and our interpretations, and were proceeding on a course of action which would resolve the outstanding issues. However, we overlooked the fact that additional actions would be required to place the plant back into compliance with the Technical Specifications.

SAFETY SIGNIFICANCE

This occurrence has no safety significance. The Palisades technical position had been previously documented to the NRC on May 22 and June 30, 1989. The emergency escape air lock remained capable of satisfying its design basis to seal under accident conditions.

CORRECTIVE ACTION

The emergency escape air lock was tested to comply with the surveillance requirement. This testing restored compliance with Technical Specifications on January 24, 1997.

On January 26, 1997, the emergency escape air lock was tested again. After this test, the strongbacks were left on the inner door, eliminating the need to open the outer door to remove the strongbacks. A temporary plant modification had been processed to document that continued plant operation was satisfactory with the strongbacks on the inner door until the NRC completes its review of the pending Technical Specification change request and the Request for Exemption to 10 CFR 50, Appendix J. This strongback prevents the opening of the emergency escape air lock inner door rendering it non-functional for egress from the containment, until the strongback can be removed by accessing it from outside of containment.

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

A major Technical Specification change request is currently being developed to convert Palisades Technical Specifications to emulate the content and format of Improved Standard Technical Specifications. The plant review of this change will involve verification that the plant procedures correctly implement all requirements of the new Technical Specifications. This review will be sufficient to assure that all Technical Specification requirements are implemented.

PREVIOUS EVENTS

Other events associated with containment integrity and air locks are License Event Reports 87-026, dated September 21, 1987, and 83-066, dated November 5, 1983.