

Attachment to LER 82-033
Consumers Power Company
Palisades Plant
Docket 50-255

As reported in LER 82-029, Palisades has been experiencing minor leakage (within Technical Specification limits) into T-82B (B Safety Injection Tank). The leakage is past loop check valve 3116 and either the tank check valve 3117 or the fill and drain valve CV-3043. While this leakage would not normally result in a significant problem or a reportable event, the problem has been compounded by a failure of the Safety Injection Tank (SIT) level indicating system. Consequently, the operators have had to rely on the high and low level switch alarms for level indication. Each time one of the alarms is received, a Limiting Condition for Operation (LCO) is entered. Specifically, the SIT must be declared inoperable until the level and boron concentration are reestablished within the limits of TS 3.3.1.b; therefore, the LCO of TS 3.3.2.a is entered.

The first event occurred before the failure of the T-82B level indicating system was recognized. To correct an apparent high level condition in T-82B, the SIT level was lowered, relying on the level indicating system. During the evolution, a low level alarm was received, even though the indicated level still showed the tank level to be within the operating band. Level was promptly restored to clear the alarm. The reportability of this event was determined on November 4.

The remaining events have all occurred in the following manner. A high level alarm is received in the control room. The tank level is lowered and the boron concentration is measured. The SIT boron concentration is diluted by the primary coolant, containing approximately 620 ppm, leaking into the SIT. Restoring the concentration is done with SIRW tank water, which is normally at 1900 ppm. Consequently, it takes several drain and fill cycles to restore the concentration. To minimize the number of drain and fill cycles, the SIT level is lowered as far as possible prior to refilling. Occasionally, the low level alarm is received while draining. The draining is then stopped and the tank is refilled. These events are summarized in Table 1.

Inspection and repair of check valve 3116 is currently scheduled for the next refueling outage. Additional monitoring will be performed to determine which other valves are leaking and necessary repairs will also be made during the next refueling outage.

We speculate that the problem with the T-82B level system appears to be related to temperature effects on the transmitter reference leg. Repair of this system during plant operation is precluded because of the high radiation field. Therefore, additional testing will be performed to isolate and correct the problem during the next extended shutdown.

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TABLE 1

Out of Specification Condition

<u>Date</u>	<u>Time</u>	<u>High Level</u>	<u>Low Level</u>	<u>Low Boron</u>
9/2	1420		X	
9/29	0401	X	X	
10/3	0208	X		X
10/3	2313	X		X
10/4	2058	X		
10/5	1305	X	X	
10/6	1749	X		
10/7	1946	X		
10/9	0055	X		X
10/10	1332	X		X
10/13	1525	X		X
10/15	1418			X
10/19	1005		X	
10/19	1836	X		
10/20	2000	X		
10/21	1607	X		X
10/22	2020	X		X