U.S. NUCLEAR REQULATORY COMMISSION APPROVED DMB NO. 3150-0104 EXPIRES 8/31/85 LICENSEE EVENT REPORT (LER) FACILITY NAME (1) DOCKET NUMBER (2) PALISADES NUCLEAR PLANT 0 |5 |0 |0 |0 |2 |5 OF Failure to Perform Surveillance Testing EVENT DATE (5) LER NUMBER (6) REPORT DATE (7) OTHER FACILITIES INVOLVED (8) SEQUENTIAL MONTH DAY DOCKET NUMBER(S) YEAR YEAR MONTH 0 |5 | 0 | 0 | 0 0 | 5 | 0 | 0 | 0 | THIS REPORT IS 2USMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR & (Check one or more of the following) (11) OPERATING 20.402(h) 50.73(a)(2)(iv) 73.71(b) 20.408(a)(1)(l) 80.73(a)(2)(v) 50.38(e)(1) 73.71(e) 20,408(a)(1)(W) OTHER (Specify in Abstract below and in Text, NRC Form 368A) (10) 50.38(e)(2) 80 73(a)(2)(will 20.408(a)(1)(iii) 80.73(c)(2)(viii)(A) 20.405 (a)(1)((v) 80 73(a)(2)(will)(B) 80 73(a)(2)(ii) 20.408(a)(1)(v) 50.73(a)(2)(iii) 80.73(a)(2)(x) LICENSEE CONTACT FOR THIS LER (12) NAME TELEPHONE NUMBER AREA CODE David W. Rogers; Technical Engineer; Palisades 16141 - 819111 COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13) REPORTABLE TO NPRDS MANUFAC. TURER CAUSE SYSTEM COMPONENT TO NPROS MANUFAC-CAUSE SYSTEM COMPONENT SUPPLEMENTAL REPORT EXPECTED (14) YEAR MONTH DAY EXPECTED YES III VM. complete EXPECTED SUBMISSION DATE! ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16) On September 6, 1984, a review determined that seven valves in the Hot Leg Injection System had not been functionally tested since their installation in 1981. The valves were not included in the surveillance testing program due to personnel error. Subsequent testing of the valves verified their operability. Due to the occurrence, the Plant was conservatively regarded as having operated with a condition prohibited by Palisades Technical Specification 3.3.1(g).

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO 3150-0104

PAGE (3)	_
PAGE (3)	
1 2 OF	2
	2 OF 0

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On September 6, 1984, with the Plant operating at approximately 75% power, a review of surveillance documentation revealed that the motor operated valves (MOVs) [20] and check valves (CK) [V] for the Hot Leg Injection System had not been functionally tested since their installation during the 1981 refueling outage. The valves involved were MOV-3080, 3081, 3082, 3083, CK-3408, 3409 and 3410.

In evaluating the occurrence, the Hot Leg Injection System was conservatively considered to be part of the Emergency Core Cooling System. Consequently, the determination was made that the Plant had operated with a condition prohibited by Palisades Technical Specification 3.3.1(g), in that the valves could not be considered operable without having been tested in over two years. Upon making this determination, a plant shutdown was initiated at 1259 on September 6, 1984, in accordance with Technical Specifications requirements.

Subsequent discussions with the NRC determined that the incident was not clearly associated with Technical Specification 3.3.1(g), and that a Plant shutdown was not warranted. The valves, however, were to be tested as soon as procedures could be developed and approved, and appropriate test conditions existed. The Plant shutdown was terminated at 1350 on September 6, 1984.

Preparations were immediately initiated to test the valves. All but one of the valves were satisfactorily tested during power operation. The remaining valve, CK-3410, could not be tested during power operation. Subsequently, CK-3410 was satisfactorily tested during a plant shutdown which occurred approximately two days later.

Investigation of the occurrence revealed that, due to personnel error, the subject valves had never been added to the surveillance program following completion of the modification which installed them. The subject valves will be added to the Inservice Testing Program to ensure that they are appropriately tested in the future.

No threat to public health or safety resulted, as the subsequent testing of the valves verified that they were indeed capable of performing their required function.



General Offices: 1945 West Parnail Road, Jackson, MI 49201 • (517) 788-0550

October 8, 1984

US Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 PALISADES PLANT - LICENSEE EVENT REPORT 84-020 - FAILURE TO PERFORM
SURVEILLANCE TESTING OF HOT LEG INJECTION SYSTEM VALVES

Attached please find Licensee Event Report 84-020 (Failure to Perform Surveillance Testing of Hot Leg Injection System Valves) which is reportable to the NRC per 10 CFR 50.73(a)(2)(i).

Ralph R Frisch

Senior Licensing Analyst

CC Administrator, Region III, USNRC
Director, Office of Nuclear Reactor Regulation
NRC Resident Inspector - Palisades

Attachment

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