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May 6, 1986

Director,
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
10CFR50.73 REPORTABILITY INTERPRETATION REQUEST**

The attached Licensee Event Report 86-016, "Inadvertent LPSI Pump Start Due to Cleaning Contacts," was forwarded separately to NRC as a voluntary report for informational purposes. It is our position that reportability of the event is not required by 10CFR50.73(a)(2)(iv). Since NRC Region III contends that the event is indeed reportable, an interpretation from NRR is requested. The following is provided in support of our position.

The occurrence consists of an inadvertent Low Pressure Injection Pump (LPSI) P-67B start during cleaning of the pump start contacts on the DBA sequencer by a plant electrician. Removal of a Q-tip wetted with isopropyl alcohol from between the contacts caused them to spring back toward each other causing closure for an instant, thereby permitting the LPSI pump to start. It is our position that actuation of this single-component does not constitute an ESF actuation.

In order to avoid initiating operation of SIS during a normal orderly shutdown when the primary system is depressurized, the SIS circuits are blocked. Blocking is manual and is effective only when three of the four pressurizer pressure indicators are below the block permissive setpoint and above the actuation setpoint. After the primary coolant system is placed back in operation and the pressurizer pressure is restored to normal, the safety injection circuit block is automatically reset when two or more of the four pressurizer pressure sensors detect greater than permissive pressure.

At the time of this occurrence, the plant was in cold shutdown condition, with the LPSI pumps aligned for shutdown cooling. The Safety Injection System was blocked as described above.

NUREG-1022 Supplement 1, Question/Answer 6.9, was utilized by Region III to support their position. However, contrary to their opinion, we feel it supports this interpretation request. The question/answer is as follows:

6.9 Question: Is the spurious operation of a system that is not required to be operable reportable?

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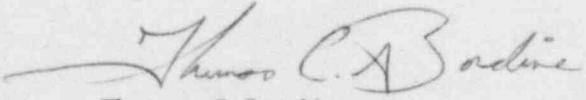
Answer: If the system is not required to be operable and it has been properly removed from service such that it cannot perform its intended function (e.g., manual discharge valves are shut, breakers are open), then a spurious actuation of part of the system (e.g., the pump starts but the discharge valve remains shut) is not reportable. However, if the system actuates and performs its intended function, the actuation is reportable even if the system is not required to be operational.

The LPSI system was not required to be operable and was properly removed from service such that it could not perform its intended function. While aligned for shutdown cooling which is an alternative function for the LPSI pump, the suction and discharge valves are aligned such that the safety injection function cannot be executed.

The "Paragraph-by-Paragraph" explanation of the LER rule contained in NUREG-1022 specifically defines "actuation" from 50.73(a)(2)(iv) as "... actuation of enough channels to complete the minimum actuation logic (i.e., activation of sufficient channels to cause activation of the ESF Actuation System). Therefore, single channel actuations, whether caused by failure or otherwise, are not reportable if they do not complete the minimum actuation logic." Relating this definition to the particular incident, it is clear that multiple channels were not involved, and the pump start was completely independent of any actuation logic.

While evaluating the cause of the event, we have concluded that the method of cleaning the contacts is acceptable; however, we are now using a tool that is less likely to allow the contacts to snap together. We have added a precautionary note to the maintenance procedure to alert the electrician of the potential for contact closure when performing this maintenance action, and we have discussed the consequences (reportability of the event) with those personnel involved. However, we have concluded that the possibility for recurrence of similar events does exist. It is our position that reporting this type of information is neither required nor desired by NRC-NRR.

Your expeditious response to this interpretation is therefore requested. Should you conclude the reporting of this event is indeed a requirement, please include an explanation as to the usefulness of such data by NRC. We will continue to report recurrences (if any) of these types of events as voluntary pending your response.


Thomas C. Bordine
Staff Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachment

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Thomas C Bordine (Signed)

Thomas C Bordine
Staff Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

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