

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Fermi 2										DOCKET NUMBER (2) 0 5 0 0 0 3 4 1 1 OF 0 3										PAGE (3) 1 OF 0 3									
TITLE (4) Missed Tech Spec Required Surveillances Because of Misinterpretation of Tech Specs																													
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 NAMES			DOCKET NUMBER(S)																	
0	3	3	1	8	6	8	6	0	0	8	0	0	0	4	3	0	8	6	0	5	0	0	0	0	0				
OPERATING MODE (9) 4		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)										DOCKET NUMBER(S)																	
POWER LEVEL (10) 0 0 1 0		20.402(b)			20.405(c)			50.73(a)(2)(iv)			73.71(b)																		
		20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)																		
		20.405(a)(1)(ii)			50.36(c)(2)			50.73(a)(2)(vi)			OTHER (Specify in Abstract below and in Text, NRC Form 366A)																		
		20.405(a)(1)(iii)			X 50.73(a)(2)(i)			50.73(a)(2)(vii)(A)																					
		20.405(a)(1)(iv)			50.73(a)(2)(ii)			50.73(a)(2)(viii)(B)																					
		20.405(a)(1)(v)			50.73(a)(2)(iii)			50.73(a)(2)(ix)																					
LICENSEE CONTACT FOR THIS LER (12)																													
NAME Lewis P. Bregni, Compliance Engineer															TELEPHONE NUMBER 3 1 3 5 1 8 6 1 - 1 5 1 3 1 1 3														
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																													
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC
SUPPLEMENTAL REPORT EXPECTED (14)															EXPECTED SUBMISSION DATE (15)														
YES (If yes, complete EXPECTED SUBMISSION DATE)															X NO														

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

During implementation of an engineering design change to the drywell sump pumps, Detroit Edison discovered that the existing surveillance procedures did not address all the technical specification surveillance requirements for the primary containment sump flow monitoring system. The deficiency was discovered on March 31, 1986, while the plant was in Operational Condition 4. Technical specifications require this monitoring system to be operable whenever the plant is in Operational Conditions 1, 2 and 3. The deficiency has existed since initial reactor startup in June 1985, and while the plant has operated in Operational Conditions 2 and 3. This event is reportable as a violation of the plant's technical specifications. Personnel involved in preparing the procedures that implement the technical specification surveillance requirements misinterpreted the requirements for demonstrating operability and omitted some tests. A revision to one of the existing surveillance procedures and the development of three new procedures will incorporate the omitted testing requirements.

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		8 6	0 0 8	0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 365A's) (17)

During implementation of an engineering design change to correct operational problems experienced with the drywell equipment drain and floor drain sump pumps, Detroit Edison discovered that the existing surveillance procedures did not address all the technical specification surveillance requirements for the primary containment sump flow monitoring system. The deficiency was discovered on March 31, 1986, while the plant was in Operational Condition 4 (Cold Shutdown).

The primary containment sump flow monitoring system is designed to detect reactor coolant leakage. As stated in technical specification 3.4.3.1.b, this sump flow monitoring system consists of the drywell floor drain sump and the drywell equipment drain sump: level, flow and pump-run-time systems. These systems must be operable during Operational Conditions 1 (Power Operation), 2 (Startup) and 3 (Hot Shutdown).

Technical specification surveillance requirement 4.4.3.1.b specifies a 31 day channel functional test and an 18 month channel calibration test to demonstrate operability of the primary containment sump flow monitoring system. Personnel involved with writing and reviewing the surveillance procedures that implement the technical specification surveillance requirements misinterpreted the requirements for demonstrating operability, resulting in the omission of some tests. The resultant surveillance procedures failed to specify the required 18 month channel calibration tests for the drywell floor drain sump pump-run-time system, and the drywell equipment drain sump pump level controls and pump-run-time system. The 31 day channel functional tests of the drywell floor drain sump pump-run-time system, and the drywell equipment drain sump level and pump-run-time system tests were also overlooked.

A revision to one of the existing surveillance procedures (44.120.50) and development of three new procedures will incorporate testing required by technical specifications for all instrumentation which originally had been omitted. These procedures will be completed by the next plant startup.

Though the plant was in Operational Condition 4 (Cold Shutdown) at the time of discovery, this deficiency has existed since initial reactor startup in June 1985, and while the plant has operated in Operational Conditions 2 and 3. Therefore, this event is reportable as a violation of the plant's technical specifications.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

EXPIRES: 8/31/88

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The safety significance of the procedural inadequacy is minimal. Despite the surveillance inadequacies, there always had been an operating means of monitoring the drywell floor and equipment drain sumps. Operations procedure 24.000.02, "Shiftly, Daily, Weekly and Situations Required Surveillances", includes a four hourly operational leakage check of these sumps. The check involves monitoring the number of gallons pumped from the sumps verses elapsed time and then comparing these values to technical specification requirements. This procedure provides the means to identify unexpected leakage rates for both the drywell floor drain sump and the drywell equipment drain sump. A leak in the reactor coolant system, large or small, would not have gone undetected as a result of performing this Operations procedure.

In addition, the surveillance procedures in place before the deficiency was found did require channel functional tests and channel calibration tests of the flow recorders and integrators for both sumps, and of the level recorder for the floor sump. Thus providing assurance that part of the primary containment sump flow monitoring system was operable.

Robert S. Lenart
Plant Manager

**Detroit
Edison**

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April 30, 1986
NP860186



Nuclear
Operations

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

Gentlemen:

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

Subject: Transmittal of Licensee
Event Report 86-008-00

Please find enclosed LER No. 85-008-00, dated April 30, 1986, for a reportable event which occurred on March 31, 1986. As indicated below, a copy of this LER is being sent to the Administrator Region III.

If you have any questions, please contact us.

Sincerely,

R. S. Lenart
Plant Manager

Enclosure: NRC Forms 366, 366A

cc: W.G. Rogers
M.D. Lynch

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