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LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)
CONSUMERS ENERGY COMPANY - PALISADES NUCLEAR PLANT

DOCKET NUMBER (2)
05000255

PAGE (3)
1 OF 2

TITLE (4)
FAILURE TO PERFORM TECHNICAL SPECIFICATION SURVEILLANCE CHANNEL CHECK OF AUXILIARY FEEDWATER FLOW INDICATION

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
03	10	99	99	-- 001	-- 0	04	09	99		05000
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
N	100	20.2201(b)	20.2203(a)(2)(v)	X	50.73(a)(2)(i)	50.73(a)(2)(viii)
		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: Daniel G. Malone, Regulatory Activities Administrator
 TELEPHONE NUMBER (Include Area Code): (616) 764-2463

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

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

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

On March 10, 1999, an audit revealed that the channel check of Auxiliary Feedwater (AFW) [BA] flow indication specified in Technical Specification Table 4.17.6, item 6 was not being performed as required by Technical Specification 3.17.6. This channel check is specified to be performed every 12 hours when the PCS temperature is greater than 300° F. However, due to a misinterpretation of the definition of a channel check, the channel check was inappropriately specified in the implementing procedure to be performed only when the AFW system was in operation. Since the AFW is not normally in operation, the 12 hour channel check was regularly not performed.

There are no safety implications associated with this occurrence since AFW flow indication is utilized during several periodic surveillance tests of the AFW system which routinely demonstrate its operability.

The implementing procedure has been revised.

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LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
CONSUMERS ENERGY COMPANY PALISADES NUCLEAR PLANT	05000255	99	001	00	2 OF 2

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

EVENT DESCRIPTION

On March 10, 1999, with the plant at full power, an audit revealed that the channel check of Auxiliary Feedwater (AFW) [BA] flow indication specified in Technical Specification Table 4.17.6, item 6 was not being performed as required. The channel check is specified to be performed every 12 hours. However, the implementing procedure inappropriately specified the channel check to be performed only when the AFW system was in operation. Since AFW is not normally in operation, the 12 hour channel check was regularly not performed.

This occurrence is reportable to the NRC in accordance with 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications.

ANALYSIS OF THE EVENT

The 12 hour channel check requirement was added as part of Technical Specification Amendment 162 which revised the Instrument and Control sections of the Technical Specifications. The amendment was issued in October 1994 and was subsequently implemented in January 1995.

The definition of a channel check in Technical Specifications begins with the statement: "A channel check shall be the qualitative assessment of channel behavior during operation by observation." The procedure sponsor, in revising the implementing procedure to accommodate the channel check of AFW flow indication, interpreted "during operation" to mean the AFW system being in operation. This errant interpretation was not detected by subsequent reviewers or performers of the procedures.

A review of Technical Specification channel check requirements reveals that the AFW flow indication channel check is unique in that it is required to be performed when the system is off, with AFW indicated flow on each channel indication being zero.

SAFETY SIGNIFICANCE

There are no safety implications associated with this occurrence. The channel check would not yield meaningful data when the AFW system is not in service.

CAUSE OF THE EVENT

The event was caused by failure to correctly interpret the definition of a channel check, which allowed the inappropriate criterion of AFW system operation to be added to the implementing procedure.

CORRECTIVE ACTIONS COMPLETED

The implementing procedure has been revised to perform the channel check as required. Other channel checks were reviewed for similar problems and none were noted.