NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

# LICENSEE EVENT REPORT (LER)

| FACILITY NAME (1) | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| Fermi 2 | 0 5 0 0 0 3 4 1 | 1 OF 0 3 |

TITLE (4) Technical Specifications for Primary Containment Integrity Not Fully Implemented Because of Procedural Inadequacies

| 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 9 | 0 3 | 8 7 | 8 7 | — 0 4 4 | — 0 0 | 1 0 | 0 3 | 8 7 | N/A | 0 5 0 0 0 |
| | | | | | | | | | N/A | 0 5 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) | | | |
|---|---|---|---|---|---|
| POWER LEVEL (10) | 0 0 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)(vii) | 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)(viii)(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)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

| NAME | TELEPHONE NUMBER |
|---|---|
| Patricia Anthony, Compliance Engineer | AREA CODE 3 1 3 5 8 6 - 1 6 1 7 |

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS | | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NPRDS | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | |
| | | | | | | | | | | | |

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

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


On September 3, 1987 at 1729 hours, it was concluded that a deficiency in the surveillance of test, vent and drain (TVD) connections existed. Technical Specification 4.6.1.1.b requires all primary containment penetrations not capable of being closed by operable automatic isolation valves be verified closed at least once per 31 days. Contrary to this, 82 TVDs and 5 bonnet taps were found not to be verified within existing surveillance procedures. No degradation of the containment integrity occurred as a result of this deficiency.

The appropriate surveillance procedures have been revised to include the TVDs and the bonnet taps.




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| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) |
|---|---|---|---|---|---|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | |
| | 0 5 0 0 0 3 4 1 | 8 7 | — 0 4 4 | — 0 0 | 0 2 OF 0 3 |

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

Initial Plant Conditions:

Operational Condition: 4 (Cold Shutdown)
Reactor Power: 0%
Reactor Pressure: 0 psig
Reactor Temperature: 140 degrees Fahrenheit

Description of Occurrence:

On September 3, 1987 at 1729 hours, based on discussions with a Nuclear Regulatory Commission's resident inspector, it was concluded that ten test, vent and drain connections (TVD) were not being verified as required by Technical Specifications for primary containment integrity. The subject TVDs are located between the inboard and outboard containment isolation valves. Technical Specification 4.6.1.1.b requires that all primary containment penetrations not capable of being closed by operable automatic isolation valves be verified to have locked closed valves, blank flanges or deactivated automatic valves at least once per 31 days. Contrary to this, the subject TVDs were not being verified on the required basis.

A review of the containment penetrations configuration was made. As a result of this review, a total of 76 TVDs outside of containment, 6 TVDs inside containment and 5 bonnet taps were identified to have this deficiency in their surveillances. The TVDs and the bonnet taps located inside containment shall be verified closed during each cold shutdown as required within the Technical Specification.

Cause of Event:

This condition was caused by inadequacies in two surveillance procedures. The procedures did not receive adequate technical review or adequate research during their development.

Analysis of Event:

While this particular requirement was not fulfilled for the subject TVDs by a 31 day Technical Specification surveillance, administrative controls for maintaining the valves in the closed position exist (Standard Operating Procedures). Additionally the caps on the TVD lines are surveilled on an 18 month basis.

The administrative controls in place have ensured these valves were in their closed positions. No degradation of primary containment integrity occurred because of the failure to perform the required surveillance of the TVDs. The only deficiency, procedural in nature, was in failing to perform the verification of containment integrity on a monthly basis.

Corrective Actions:

The appropriate procedures, 24.425.01, "Primary Containment Integrity Verification for Valves Outside Containment" and 24.425.03, "Primary Containment Position Indication and Operability Verification for Valves Inside Containment", were revised to include the TVDs and the bonnet taps in their scope. These revised procedures will be performed as required during the plant restart from the present outage.

Detroit Edison is correcting the programmatic deficiencies associated with the Technical Specification surveillance program by performing a detailed technical review of the Technical Specification surveillance requirements and corresponding surveillance procedures. This effort is scheduled to be completed by March 31, 1987.

Previous Occurrences:

In Licensee Event Report 85-060, an inadequacy in administrative controls of TVD position with regards the maintenance activity resulted in a TVD being left open. As corrective action, the administrative controls for returning equipment to service after maintenance or modification work were reinforced. There has not been another occurrence of this nature since that time. No other previous inadequacies in the surveillance of primary containment integrity have been identified.

Detroit Edison
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(313) 586-4000

10CFR50.73

Nuclear Operations

October 3, 1987
NRC-87-0161

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

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

Subject: Licensee Event Report (LER) No. 87-044-00

Please find enclosed LER No. 87-044-00, dated October 3, 1987, for a reportable event that occurred on September 3, 1987. A copy of this LER is also being sent to the Regional Administrator, USNRC Region III.

If you have any questions, please contact Patricia Anthony at (313) 586-1617.

Sincerely,

W. S. Orser
Plant Manager

Enclosure: NRC Forms 366, 366A

cc: A. B. Davis
J. R. Eckert
E. G. Greenman
W. G. Rogers
J. J. Stefano

Wayne County Emergency
Management Division

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