

December 6, 1999

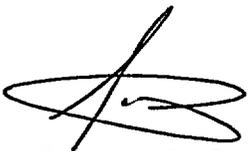
U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
LICENSEE EVENT REPORT 99-005, CHARCOAL FILTER NOT IN SERVICE DURING
MOVEMENT OF IRRADIATED FUEL ASSEMBLIES**

Licensee Event Report (LER) 99-005 is attached. The LER describes the occurrence of the charcoal filter not being in operation during fuel handling activities in the fuel storage building as is required by Technical Specification 3.8.4. 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.

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.



Douglas E. Cooper
General Manager Plant Operations

CC Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

Attachment

IE22

PDR ADDN 05000255

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-8 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

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 3

TITLE (4)
CHARCOAL FILTER NOT IN SERVICE DURING MOVEMENT OF IRRADIATED FUEL ASSEMBLIES

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
11	06	1999	1999	-- 005	-- 00	12	06	1999	FACILITY NAME	DOCKET NUMBER 05000
									FACILITY NAME	DOCKET NUMBER 05000
OPERATING MODE (9)	N		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)	000		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
Sheri L. King, Sr. Technical Analyst

TELEPHONE NUMBER (Include Area Code)
(616) 764-2036

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

At approximately 0845 hours on November 6, 1999 with the plant in refueling shutdown, it was discovered that the charcoal filter [FLT] associated with the ventilation system [VG] in the fuel storage building was not in operation during fuel handling activities. Technical Specification 3.8.4 requires that the ventilation system and charcoal filter in the fuel storage building be in operation during fuel handling. 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.

Checklists are performed to ensure the ventilation equipment status meets the requirements for fuel handling activities. The event was caused by the licensed operator prematurely completing the general checklist before the ventilation requirements for fuel handling activities were met, and a lack of communication to the crew by the control room supervisor when fuel moves were authorized.

There was no safety significance associated with this occurrence.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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CONSUMERS ENERGY COMPANY PALISADES NUCLEAR PLANT	05000255	1999	005	00	2 OF 3

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

EVENT DESCRIPTION

At approximately 0845 hours, on November 6, 1999 with the plant in refueling shutdown, it was discovered that the charcoal filter associated with the ventilation system in the fuel storage building was not in operation during fuel handling as required by Technical Specification 3.8.4. 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

Technical Specification 3.8.4 requires the ventilation system and charcoal filter to be in operation whenever irradiated fuel which has decayed less than 30 days is being handled in the fuel storage building.

Two checklists are used to ensure the ventilation equipment status meets the requirements for fuel handling activities, a ventilation system checklist and a general checklist. The ventilation system checklist has a dual purpose in that it specifies the ventilation alignment for both fuel handling and non-fuel handling activities. Fuel handling was not in progress at the beginning of the shift in question. The ventilation system checklist was completed reflecting this condition. The general checklist is intended to ensure the proper ventilation lineup by confirming that the ventilation system checklist has been completed for fuel handling activities.

The licensed operator who had completed both the ventilation system checklist and general checklist erred in prematurely signing off on the general checklist when the ventilation system checklist hadn't been completed for fuel handling activities. When the general checklist was signed simply because the ventilation checklist had been completed on that shift, the operator achieved literal compliance but failed to meet the intent of the general checklist. The operator intended to properly align the charcoal filter later in the shift upon notification that fuel handling activities were to commence; however, when fuel handling activities were subsequently authorized by the control room supervisor at 2230 hours on November 5, 1999, none of the rest of the crew were notified.

At approximately 0130 hours on November 6, 1999, fuel moves commenced without the charcoal filter in service. The condition was discovered at approximately 0845 hours on November 6, 1999.

SAFETY SIGNIFICANCE

There was no safety significance associated with this occurrence. In the event that a fuel handling incident had occurred, Operations procedure ONP-11.2 "Fuel Handling Accident" directs as an immediate action that the fuel storage building charcoal filter be placed in service if it is not already aligned. This would have mitigated any potential radioactive release.

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

CAUSE OF THE EVENT

The event was caused by the licensed operator prematurely completing the general checklist before the ventilation requirements for fuel handling activities were met, and lack of communication to the crew by the control room supervisor when fuel moves were authorized.

CORRECTIVE ACTIONS

Upon discovery of fuel moves in progress without the charcoal filter in service, fuel handling activities were suspended and an Incident Response Team was formed to investigate the event. The occurrence was reviewed with appropriate personnel with emphasis on attention to detail, importance of good crew communication, and maintaining clear oversight of fuel handling activities.

The checklists will be revised for clarification.