

December 22, 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 99-006, FAILURE TO PERFORM TECHNICAL**  
**SPECIFICATION SURVEILLANCE OF FUEL OIL STORAGE TANK LEVEL**

Licensee Event Report (LER) 99-006 is attached. The LER describes the discovery that the surveillance of fuel oil storage tank level had not been performed within the interval specified by Technical Specification 4.7.3.1. 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.

*Nathan L. Haskell*  
Nathan L. Haskell  
Director, Licensing

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

Attachment

IE 22 1/1

PDR ADOCK 05000255

**LICENSEE EVENT REPORT (LER)**

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

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-6 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.

**FACILITY NAME (1)**

CONSUMERS ENERGY COMPANY - PALISADES NUCLEAR PLANT

**DOCKET NUMBER (2)**

05000255

**PAGE (3)**

1 OF 3

**TITLE (4)**

FAILURE TO PERFORM TECHNICAL SPECIFICATION SURVEILLANCE OF FUEL OIL STORAGE TANK LEVEL

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	23	1999	1999	-- 006	-- 00	12	22	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 5: (Check one or more) (11)									
POWER LEVEL (10)	000	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	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).

NO

**EXPECTED SUBMISSION DATE (15)**

MONTH DAY YEAR

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

At approximately 1745 hours on November 23, 1999, with the plant in refueling shutdown, it was discovered that the daily surveillance of fuel oil storage tank level specified by Technical Specification 4.7.3.1 had not been performed within its specified interval plus allowable extension. 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.

Performance of the surveillance was late by approximately 12 hours. Upon discovery, the surveillance was promptly completed with satisfactory results.

There was no safety significance associated with this occurrence since at all times the amount of oil stored in the tank met requirements.

**LICENSEE EVENT REPORT (LER)**  
TEXT CONTINUATION

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CONSUMERS ENERGY COMPANY PALISADES NUCLEAR PLANT	05000255	1999	006	00	2 OF 3

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

**EVENT DESCRIPTION**

At approximately 1745 hours on November 23, 1999, with the plant in refueling shutdown, it was discovered that the daily surveillance of fuel oil storage tank [TK;DC] level specified by Technical Specification 4.7.3.1 had not been performed within its specified interval plus allowable extension.

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 surveillance of fuel oil storage tank level is one of several daily surveillances which is normally performed each day between the hours of 0000 and 0100 by a licensed operator. The surveillance requirement is satisfied by observation of the fuel oil storage tank level indication in the control room, and comparing the reading to fuel oil storage tank level requirements.

The fuel oil storage tank level surveillance had previously been completed on November 22, 1999 at approximately 0000 hours. The 24 hour interval plus 25 percent (6 hour) allowable extension for surveillance completion expired at approximately 0600 hours on November 23, 1999. Since the condition was discovered at approximately 1745 hours on November 23, 1999, surveillance performance was late by approximately 12 hours. Upon discovery, the fuel oil storage tank was declared inoperable and action was initiated to perform the surveillance. The surveillance was promptly completed at approximately 1800 hours, November 23, 1999, with satisfactory results.

**SAFETY SIGNIFICANCE**

There was no safety significance associated with this occurrence since at all times the amount of fuel oil stored in the tank met requirements.

**CAUSE OF THE EVENT**

The licensed operators perform this surveillance according to routine, without benefit of an additional checklist or similar administrative tool to ensure completion of the surveillance. In this instance, the licensed operator was engaged in other assigned activities and simply failed to remember to perform the surveillance.

The control room supervisor has a checklist item as a prompt to ensure that the completed surveillance is reviewed. In this instance, the control room supervisor inappropriately assumed that another on-shift senior licensed operator had performed the review of the completed surveillance, without verifying this assumption.

**LICENSEE EVENT REPORT (LER)**  
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

**CORRECTIVE ACTION**

Performance of daily surveillance items has been specifically assigned to the licensed operator - turbine position, and a checklist item has been added to the turnover checklist for this position as an administrative tool to ensure surveillance performance.