

A CMS Energy Company

Palisades Nuclear Plant 27780 Blue Star Memorial Highway Covert, MI 49043

Tel: 616 764 2276 Fax: 616 764 3265

Nathan L. Haskell Director, Licensing

December 22, 1999

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

DOCKET <u>50-255</u> - LICENSE <u>DPR-20</u> - 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.

Vithan IHaskell Nathan L. Haskell Director, Licensing

CC

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

Attachment

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LICENSEE EVENT REPOR' (See reverse for required nui digits/characters for each					ORT (LEF	nber of				APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/200° 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) US. 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 no conduct or sponsor, and a person is not required to respond to, the information collection.						
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NRC FORM 366a U.S. NUCLEAR REGULATORY COMMISSION (6-1998) LICENSEE EVENT REPORT (LER) **TEXT CONTINUATION** FACILITY NAME (1) DOCKET(2) LER NUMBER (6) **PAGE CONSUMERS ENERGY COMPANY** YEAR SEQUENTIAL REVISION PALISADES NUCLEAR PLANT NUMBER NUMBER 05000255 2 OF 3 1999 006 00

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.

NRC FORM 366a (6-1998)	U.S.	U.S. NUCLEAR REGULATORY COMMISSION								
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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.