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10 CFR 50.73

March 31, 2016
NRC-16-0018

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

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

Subject: Licensee Event Report (LER) No. 2015-009

Pursuant to 10 CFR 50.73(a)(2)(i)(B), DTE Electric Company (DTE) is submitting LER No. 2015-009, Condition Prohibited by Technical Specification Due to Missed Entry into LCO Condition.

No commitments are being made in this LER.

Should you have any questions or require additional information, please contact Mr. Alan I. Hassoun of my staff at (734) 586-4287.

Sincerely,

Keith J. Polson
Site Vice President

Enclosure: Licensee Event Report (LER) No. 2015-009, Condition Prohibited by Technical Specification Due to Missed Entry into LCO Condition

cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 5, Region III
Regional Administrator, Region III
Michigan Public Service Commission
Regulated Energy Division (kindschl@michigan.gov)

**Enclosure to
NRC-16-0018**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**Licensee Event Report (LER) No. 2015-009, Condition Prohibited by Technical
Specification Due to Missed Entry into LCO Condition**



LICENSEE EVENT REPORT (LER)

(See Page 2 for required number of
digits/characters for each block)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Privacy and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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.

1. FACILITY NAME

Fermi 2

2. DOCKET NUMBER

05000 341

3. PAGE

1 OF 3

4. TITLE

Condition Prohibited by Technical Specification Due to Missed Entry into LCO Condition

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
07	28	2015	2015	009	00	03	31	2016	N/A	05000
									FACILITY NAME	DOCKET NUMBER
									N/A	05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)			
1	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)
10. POWER LEVEL	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)
	<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> 73.77(a)(1)
	<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	<input type="checkbox"/> 73.77(a)(2)(i)
	<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> 73.77(a)(2)(ii)
		<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> OTHER	Specify in Abstract below or in NRC Form 366A

12. LICENSEE CONTACT FOR THIS LER

LICENSEE CONTACT
Alan I. HassounTELEPHONE NUMBER (Include Area Code)
(734) 586-4287

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

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
N/A	N/A	N/A	N/A	N/A					

14. SUPPLEMENTAL REPORT EXPECTED

☐ YES (If yes, complete 15. EXPECTED SUBMISSION DATE) ☒ NO15. EXPECTED
SUBMISSION
DATE

MONTH	DAY	YEAR

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

At 0400 EDT on July 28, 2015, Fermi 2 operators started a planned Safety System Outage including work on the Division 2 Mechanical Draft Cooling Tower (MDCT) Fan D, which is required for the Division 2 Ultimate Heat Sink (UHS) to be operable. On July 28, 2015 at 2115, MDCT Fan D had been restored and Operators reviewed the Limiting Condition for Operation (LCO) log before exiting the LCO Condition. During this review, it was discovered that LCO 3.7.2 Condition B, for inoperable UHS, was not entered. Note 1 of LCO 3.7.2 directs Operators to enter applicable Conditions and Required Actions of LCO 3.8.1 for emergency diesel generators (EDGs) made inoperable by UHS. Due to the missed LCO 3.7.2 Condition B entry, Required Actions A.1, A.3, and B.1 of LCO 3.8.1 to verify operable offsite power circuits and availability of Combustion Turbine Generator (CTG) 11-1 were not performed within their required completion times. Required Actions A.1, A.3, and B.1 were immediately performed and the equipment was found operable.

The cause of this event was inadequate self-checking and peer-checking during preparation and approval of the LCO log entries, which did not identify the inadvertent deletion of LCO 3.7.2 Condition B and LCO 3.8.1 Conditions A and B. Individual performance issues were addressed and lessons learned were shared.

LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
Fermi 2	05000- <div style="border: 1px solid black; width: 100px; height: 30px; display: flex; align-items: center; justify-content: center;">341</div>	YEAR	SEQUENTIAL NUMBER	REV NO.
		2015	- 009	- 00

Initial Plant Conditions

Mode 1
Reactor Power 100 percent

There were no structures, systems, or components (SSCs) that were inoperable at the start of this event that contributed to this event.

Description of the Event

At 0400 EDT on July 28, 2015, Fermi 2 Operators entered Limiting Condition for Operation (LCO) 3.7.2 Condition C for one Emergency Equipment Cooling Water/Emergency Equipment Service Water (EECW/EESW) [CC] subsystem inoperable for planned work on the Division 2 EECW/EESW and Ultimate Heat Sink (UHS) [BS]. This Safety System Outage (SSO) included work on Division 2 Mechanical Draft Cooling Tower (MDCT) [CTW] Fan D [FAN]. Per the Technical Specification Bases, each UHS division requires both MDCT fans be operable. Therefore, while MDCT Fan D was out of service for maintenance from 0427 to 2057 EDT on July 28, 2015, the Division 2 UHS was inoperable.

At 2115 EDT on July 28, 2015, Operators reviewed the LCO log before exiting the LCO Condition. During this review, the on-shift Control Room Supervisor discovered that LCO 3.7.2 Condition B, for inoperable UHS, had not been entered. Both Conditions B and C of LCO 3.7.2 require restoration within 72 hours. Additionally, Note 1 of LCO 3.7.2 requires entering applicable Conditions and Required Actions of LCO 3.8.1 for emergency diesel generators (EDGs) [DG]. In this event, EDGs 13 and 14 should have been declared inoperable as a result of the Division 2 UHS being inoperable.

LCO 3.8.1 Conditions A and B, for one EDG inoperable and both EDGs in one division inoperable, respectively, should have been entered. LCO 3.8.1 Condition A, Required Action A.1, requires that surveillance (SR) 3.8.1.1 be performed for operable offsite power circuit(s) within one hour and once per 8 hours thereafter. SR 3.8.1.1 verifies correct breaker alignment and indicated power availability for each offsite circuit. LCO 3.8.1 Condition B, Required Action B.1, also requires that SR 3.8.1.1 be performed within one hour and once per 8 hours thereafter.

LCO 3.8.1 Condition A, Required Action A.3, requires that the status of Combustion Turbine Generator (CTG) [GEN] 11-1 be verified once per 8 hours.

LCO 3.8.1 Conditions A.2 and B.2 state that required support features, supported by the inoperable EDG(s), must be declared inoperable within 4 hours when the redundant required feature(s) are inoperable. In this event, no redundant required features were inoperable. LCO 3.8.1 Conditions A and B include other required actions, which were not required to be performed within the timeframe of this event.

Therefore, the applicable Required Actions that were not completed within their completion times for this event were LCO 3.8.1 Condition A, Required Actions A.1 and A.3, and LCO 3.8.1 Condition B, Required Action B.1. Upon discovery of this condition, these three Required Actions were immediately performed in accordance with procedure 24.000.01, Situational Surveillances/LCO Action Tracking, attachments 28b and 28c. The offsite power circuits were operable and CTG 11-1 was available.

LICENSEE EVENT REPORT (LER) CONTINUATION SHEET

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
Fermi 2	05000- 341	YEAR 2015	- SEQUENTIAL NUMBER 009	- REV NO. 00

LCO 3.7.2 Condition B and LCO 3.8.1 Conditions A and B were entered when the error was discovered at 2115 EDT and all three LCO Conditions were exited at 2242 EDT on July 28, 2015 following the completion of procedure 24.000.01, attachments 28b and 28c.

This event is being reported under 10 CFR 50.73(a)(2)(i)(B), as an operation or condition prohibited by TS.

Significant Safety Consequences and Implications

There were no safety consequences or radiological releases associated with this event. The three applicable Required Actions were performed immediately upon discovery of the missed LCO Condition entries in accordance with procedure 24.000.01. The offsite power circuits were operable and CTG 11-1 was available throughout the time period when EDGs 13 and 14 were inoperable. No equipment failures or alignments existed from the time the LCO Conditions should have been entered (0400 EDT) to the time of discovery (2115 EDT). There was no effect on the health and safety of the public.

This event did not involve a failed component and there were no automatic or manual safety system actuations associated with this event.

Cause of the Event

When the LCO log entries were originally prepared, they included correct entries to LCO 3.7.2 Condition B and LCO 3.8.1 Conditions A and B. These LCO Condition entries were inadvertently deleted during final preparation and approval by the on-shift Senior Reactor Operators.

The cause of this event was determined to be inadequate self-checking and peer-checking by Senior Reactor Operators during the preparation and approval of the LCO Condition entries. A second cause was failure to maintain a questioning attitude and validate assumptions during subsequent reviews and activation of the LCO Condition entries.

Corrective Actions

Personal performance issues were addressed through formal coaching of the individuals involved in the preparation, approval, activation, and subsequent reviews of the LCO Condition entries for this event. The lessons learned were shared with all site employees via a Department Event Free Day Reset Briefing Sheet.

Interim guidance was established, which required all LCO Condition entries to be reviewed independently and that the Shift Manager review and authorize all LCO activations. The effectiveness of the interim guidance was reviewed to ensure that the required behaviors had been ingrained, and the interim guidance was removed.

Previous Occurrence

No similar previous occurrences were identified.