NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
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TITLE (4)

Division I SGTS and CO2 System Inoperable

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 5 0 0 0
0 4	0 7	8 5	8 5	— 0 0 6	— 0 0	0 5	2 4	8 5		0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		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
A.E. Wegele, Compliance Engineer	AREA CODE 3 1 3 5 8 6 - 5 3 1 3

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)

Division I of the Standby Gas Treatment System and its associated CO_2 fire protection system were not recognized as being inoperable for approximately fifteen days and thirteen days, respectively. The plant was in Operational Condition 5 and core alterations were performed during this time thus violating technical specifications.

The cause was failure to properly align both systems when returned to service following minor modifications. A memo describing the incident and its causes has been placed on the required reading list for licensed operators and the procedure for returning systems to service is being revised to more explicitly discuss verifications required to ensure system operability.

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

On April 3, 1985, at 1200 hours, Division I of the Standby Gas Treatment System (SGTS) was removed from service to perform minor modifications to the temperature sensor circuitry which activates the CO_2 fire protection for the SGTS. The plant was in Operational Condition 5 with Control Rod Drive repair in progress. Division II of the SGTS was operable.

The work order for the job included an Abnormal Lineup Sheet which specified that the isolation valve on the SGTS CO_2 tank was to be closed, the SGTS circuit breaker was to be opened and the corresponding control fuses were to be removed for personnel protection while the modifications were in progress.

On April 6, 1985, at about 1615 hours, the SGTS circuit breaker was closed and the control fuses were reinstalled to permit testing of the temperature sensing circuitry following the modification. The testing was satisfactory and thus on April 7, at 0743 hours the personnel protection being provided for the job was terminated. This was done without processing the Abnormal Lineup Sheet contrary to procedure. Consequently the CO_2 tank isolation valve was not recognized as being in the closed position by the tagging center coordinator. The tagging center coordinator who processed the work order then notified the control room operator that Division I of the SGTS could be returned to service. The control room operator verified that normal panel indications existed and declared Division I SGTS operable at 0750 hours on April 7. At this point, the CO_2 system for Division I of SGTS was required operable by Technical Specification 3.7.7.3.b. It was not operable because of the closed isolation valve from the CO_2 tank. In addition, Division I of the SGTS was not operable in that a relay had been inadvertently actuated during the modification. This relay provides a trip and lockout signal to the SGTS Exhaust and Cooling Fans. This relay is designed to actuate when the CO_2 system is activated. The activation of the CO_2 system is alarmed in the control room thus normally the operator would know that the relay has been activated. Since this situation did not exist, the control room operator was not aware of the lockout signal.

This situation went unrecognized until about 2230 hours on April 20, 1985, when during the performance of the valve lineup surveillance on the Division I SGTS CO_2 system, the closed isolation valve was discovered. The valve was opened and the CO_2 system was declared operable.

On April 22 at 2110 hours, the Division I SGTS Exhaust Fan failed to start during the routine monthly surveillance test. During the subsequent investigation, the tripped relay was discovered and reset. The surveillance test was then successfully performed. The Division I SGTS system was declared operable at 0708 on April 23, 1985. It had been inoperable for approximately 20 days. During this time core alterations were performed which require both divisions of the SGTS to be operable. Had the need existed however, Division II of the SGTS could have performed its intended function.

The cause of CO_2 system inoperability was failure to follow procedures for processing the Abnormal Lineup Sheet prior to returning the system to service. The cause of the inoperability of the SGTS was failure to recognize the potential of the trip and lockout relay to be actuated during the modifications.

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

This was due in part to the failure to discuss the function of the relay in the system operating procedure.

The system operating procedure has been revised to include a discussion of the relay and its function. The operator training on the SGTS will be revised to include a discussion of the relay. A memo describing the incident and its causes has been placed on the required reading list for licensed operators. In addition, the procedure for returning systems to service that are required by Technical Specifications will be modified to more explicitly discuss the actions and verifications which must be performed prior to declaring systems operable following modification or maintenance.

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May 24, 1985
NP-85-534

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

Gentlemen:

Reference: Fermi 2
NRC Operating License No. NPF-33

Subject: Transmittal of Licensee Event Report No. 85-006

Please find enclosed LER No. 85-006-00, dated May 24, 1985, for a reportable event which occurred on April 7, 1985. Per discussion with Region III, an extension was granted to defer submittal until May 24, 1985. As indicated below, a copy of this LER is being sent to the Region III office.

If you have any questions, please contact us.

Sincerely,

R.S. Lenart
Superintendent
Nuclear Production

Enclosure: NRC Forms 366, 366A

cc: Mr. P.M. Byron

Regional Administrator
USNRC Region III
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