

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)

Fermi 2

DOCKET NUMBER (2)

0 5 0 0 0 3 4 1 1 OF 0 2

PAGE (3)

TITLE (4)

Control Rod Drive Friction Testing Performed with RPS Shorting Links Installed

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	4	2	6	8	5	8	5	0	0	9	0	0	0	5	2	6	8	5	0	5	0	0	0
OPERATING MODE (9)		5		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8: (Check one or more of the following) (11)																			
POWER LEVEL (10)		0		0		0		20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)									
								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 365A)									
								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

A.E. Wegele, Compliance Engineer

TELEPHONE NUMBER

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 NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)		NO		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
		X					

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

On April 26, 1985 at 0940 hours, with the plant in operational condition 5 and control rod drive friction testing in progress, control room personnel suspended testing when they noted that the condition 5 surveillance log indicated the RPS shorting links were not removed as required by Technical Specification 3.9.2.c. All control rods were inserted or verified to be fully inserted and personnel were directed to suspend core alterations.

Plant staff reviewed Technical Specifications 3.9.2 and 3.9.3 with the resident inspector and NRR in Washington to resolve an apparent conflict between Specification 3.9.2.c and Surveillance Requirement 4.9.2.d. The plant was later informed that NRR's interpretation of Specification 3.9.2.c required that the shorting links be removed during single control rod withdrawals. The Nuclear Shift Supervisor authorized removal of the shorting links at 0130 on April 27 and control rod drive friction testing recommenced at 0545 hours that day. This event will be reviewed with all licensed personnel and a technical specification change will be requested to resolve the conflict between specifications 3.9.2 and 4.9.2.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Fermi 2	0500034185	—	009	—00	02	OF	02

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

On April 26, 1985, at 0940 hours, with the plant in Operational Condition 5 and control rod drive friction testing in progress, control room personnel suspended testing when they noted that the condition 5 surveillance log indicated the RPS shorting links were not removed as required by Technical Specification 3.9.2.c. All control rods were inserted or verified to be fully inserted (only one was withdrawn at the time) and all control room personnel were notified and directed to suspend core alterations until further notice.

Members of the plant staff reviewed Technical Specification 3.9.2 and 3.9.3 with the resident inspector, then called NRC's Office of Nuclear Reactor Regulation (NRR-Washington) to clarify the intent of Specification 3.9.2. At 1640 hours the NSS was informed that NRR's interpretation of the wording of Specification 3.9.2 requires that the RPS shorting links be removed during single control rod withdrawal (i.e., core alterations). The NSS authorized removal of the shorting links at 0130 hours on April 27. Control rod stroke time testing recommended at 0545 hours on April 27, 1985.

The root cause of this event was misinterpretation of Technical Specification 3.9.2.c. For approximately two weeks prior to this event, control rod drive mechanism removal and refurbishment had been ongoing. The operators performing the condition 5 shiftly surveillance during that period logged "N/A" in the space provided for "Shorting Link Removal". Verification of shorting link removal was not required because the control rods were removed per Technical Specification 3.9.10.1, "Single Rod Removal", which does not require shorting link removal.

On April 25, 1985, the shiftly surveillance had already been performed by the 1600 to 2400 shift NSO when control rod stroke time testing began at 2200 hours. On April 26, 1985, when the shiftly surveillance was performed on the 0000 to 0800 shift, the NSO consulted Technical Specification 3.9.2.c. This section requires the shorting links to be removed from the RPS circuitry prior to and during the time any control rod is withdrawn and shutdown margin demonstrations are in progress. Because shutdown margin demonstrations were not in progress, the NSO determined that removal of the shorting links was not required and entered "N/A" on the shift surveillance log sheet. When the shiftly surveillance was performed on the 0800 to 1600 shift, the NSS and the NSO performing the surveillance discussed the technical specification requirements. The decision was made that core alterations should be suspended because the Surveillance Requirements 4.9.2.d.1 and 2 of Specification 3.9.2 state that the shorting links must be removed whenever a control rod is withdrawn or shutdown margin testing is in progress. The NSS suspended core alterations until plant staff could provide resolution, as described above.

To prevent recurrence of this event, this event report will be reviewed with all licensed personnel through the requalification training program and the required reading program to ensure that they understand that the shorting links must be removed or all rods fully inserted, unless Specifications 3.9.10.1 or 3.9.10.2 apply. Detroit Edison also intends to request a change in Specification 3.9.2.c to resolve the apparent conflict with the language of Surveillance Requirement 4.9.2.d.

**Detroit
Edison**

2000 Second Avenue
Detroit, Michigan 48226
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May 28, 1985
NP-85-0576

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

Gentlemen:

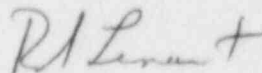
Reference: Fermi 2
NRC Operating License No. NPF-33

Subject: Transmittal of Licensee Event Report No. 85-009

Please find enclosed LER No. 85-009-00, dated May 28, 1985, for a reportable event which occurred on April 26, 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
Mr. M.D. Lynch

Regional Administrator
USNRC Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

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