

## LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Fermi-2										DOCKET NUMBER (2) 0 5 0 0 0 3 4 1										PAGE (3) 1 OF 0 3	
TITLE (4) RWCU Isolation Valves																					
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	7	10	8	5	8	5	0	3	6	0	0	0	8	0	9	8	5	0 5 0 0 0			
OPERATING MODE (9) 2			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 8. (Check one or more of the following) (11)																		
POWER LEVEL (10) 0 10 1			20.402(b)			20.408(a)			80.73(a)(2)(iv)			73.71(b)									
			20.408(a)(1)(i)			80.38(a)(1)			80.73(a)(2)(v)			73.71(a)									
			20.408(a)(1)(ii)			80.38(a)(2)			80.73(a)(2)(vi)			OTHER (Specify in Abstract below and in Text, NRC Form 306A)									
			20.408(a)(1)(iii)			80.73(a)(2)(i)			80.73(a)(2)(viii)(A)												
			20.408(a)(1)(iv)			80.73(a)(2)(ii)			80.73(a)(2)(viii)(B)												
			20.408(a)(1)(v)			80.73(a)(2)(iii)			80.73(a)(2)(ix)												
LICENSEE CONTACT FOR THIS LER (12)																					
NAME L.P. Bregni, 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 NRC		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC											
SUPPLEMENTAL REPORT EXPECTED (14)												EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR					
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)												<input checked="" type="checkbox"/> NO									

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

On July 10, 1985, the inboard and outboard primary containment isolation valves for the Reactor Water Cleanup (RWCU) system were left in the open position with flow to the RWCU pumps and the breakers for the valves deenergized. At the time the plant was in Operational Condition 2 (Startup) and reactor power at less than 1 percent. This defeated the automatic isolation function of these valves, and was a violation of technical specification 3.6.3. This condition existed for about two hours and twenty-five minutes while performing a 31 day channel functional test of the RWCU delta flow instrumentation. The test is required by technical specification section 4.3.2.1 and Table 4.3.2.1-1.2.a. The surveillance test procedure was in error and required that the valves be deenergized while in the open condition. The surveillance test procedure has been corrected. There were no significant operational occurrences during, or as a result of this event.

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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 (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
Fermi-2	05000341	85	036	00	0	2	OF 03

TEXT (If more space is required, use additional NRC Form 306A's) (17)

At 0850 hours on July 10, 1985, the Nuclear Shift Supervisor (NSS) signed on surveillance procedure 44.020.151, "NSSSS - Reactor Water Clean Up Differential Flow Functional Test". In accordance with this surveillance test procedure, the NSS directed that the Reactor Water Cleanup (RWCU) valves G33F001 and G33F004 be deenergized in the open position. These are, respectively, the inboard and outboard primary containment isolation valves in the common supply line to the RWCU pumps from the reactor pressure vessel. Although it was specified by the surveillance procedure, having both valves open and deenergized is a violation of technical specification 3.6.3. This specification requires at least one operable isolation valve in an open penetration when in Operational Condition 1, 2, or 3. Otherwise, be in at least hot shutdown within the next 12 hours. At the time, the plant was in Operational Condition 2 (Startup) and reactor power at less than 1 percent.

Before complying with the surveillance test procedure step, the NSS discussed the technical specification on these valves with his control room staff. They concluded that deenergizing these valves in the open position was not in violation of the technical specification. Their decision was based on a misinterpretation of the technical specification action statement. It was interpreted to mean that the plant had twelve hours to be in hot shutdown with both RWCU isolation valves open and deenergized. The decision was made, and shortly after 0850 hours the valve breakers were opened with the valves in the open position and flow to the RWCU pumps. At that time, an entry was made in the NSS log as well as the out-of-spec log. The NSS log entry noted that the plant was in a LCO, and that the RWCU valves must be reenergized within twelve hours.

The surveillance was completed satisfactorily, and at 1115 hours valves G33F001 and G33F004 were reenergized, and the RWCU system was returned to service. Total time with the valves open and deenergized was about two hours and twenty-five minutes. This was noted in the NSS log and the out-of-spec log entry was cleared.

Later that day while reviewing the out-of-spec log entries, the Operations Engineer recognized the condition as a violation of technical specifications because of a similar event that occurred on July 4, 1985. This has been reported as the subject of LER 85-032, report date August 3, 1985. In that LER, one of the corrective actions described was to discuss the event with the Nuclear Shift Supervisors. At the time this event occurred however, that discussion had not yet taken place.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 8/31/85

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

Detroit Edison recognizes that timely notification of the Operations staff of events such as these is critical in preventing repeated occurrences. And that this event could have been prevented if the Nuclear Shift Supervisors had been informed.

The Nuclear Shift Supervisors have been made aware of this event. This LER will be placed in the required reading for all licensed operators.

Surveillance procedure 44.020.151 is a channel functional test of the RWCU system delta flow instrumentation and is intended to comply with the surveillance requirements of technical specification section 4.3.2.1 and Table 4.3.2.1-1.2.a. This specification requires that a channel functional test is performed every 31 days, and a channel calibration every 18 months. This was the first time the surveillance had been performed with the plant in an operational condition that caused a violation of technical specifications.

The delta flow instrumentation provides isolation actuation for the subject RWCU isolation valves on a RWCU system high flow imbalance condition. The surveillance procedure was written to preclude an actuation of the isolation feature of this instrumentation by requiring that the RWCU isolation valves be deenergized. When the surveillance procedure was written, it was not recognized that doing so was in violation of technical specification 3.6.3.

The surveillance procedure for both the channel functional test and channel calibration have been revised to require that the RWCU system be shut down in accordance with the System Operating Procedure SOP 23.707, and that the G33F001 and G33F004 valves are closed. These changes will preclude having this event recur.

The safety consequences of this event is the loss of automatic isolation capability of the RWCU system if it had been required. The RWCU leak detection system was operable, and would have provided alarm indication in the control room of breaches in the system pressure boundary. The capability to manually isolate the system if required existed at the time of the event, including other valves operable from the control room. Although additional time is required to operate these valves manually, safety systems are capable of providing adequate core cooling to permit manual RWCU isolation. There were no significant operational occurrences during, or as a result of this event.

**Detroit  
Edison**

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August 9, 1985  
NP850019

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

Gentlemen:

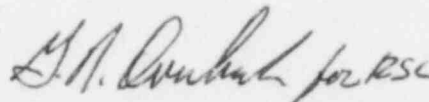
Reference: Fermi 2  
NRC Docket No. 50-341  
NRC Operating License No. NPF-43

Subject: Transmittal of Licensee  
Event Report 85-036

Please find enclosed LER No. 85-036-00, dated August 9, 1985, for a reportable event which occurred on July 10, 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  
Plant Manager

Enclosure: NRC Forms 366, 366A

cc: P.M. Byron  
M.D. Lynch

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