

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) PALISADES PLANT										DOCKET NUMBER (2) 0 5 0 0 0 2 5 5				PAGE (3) 1 OF 03		
TITLE (4) Failure to Perform Hydrostatic Testing																
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)			
1	0	8	8	5	0	2	0	0	1	1	0	7	8	5	NA	0 5 0 0 0 0
OPERATING MODE (9)			THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5: (Check one or more of the following) (11)													
POWER LEVEL (10)			20.402(b)				20.405(a)				80.73(a)(2)(iv)				73.71(b)	
			20.405(a)(1)(i)				80.38(a)(1)				80.73(a)(2)(v)				73.71(a)	
			20.405(a)(1)(ii)				80.38(a)(2)				80.73(a)(2)(vi)				OTHER (Specify in Abstract below and in Text, NRC Form 305A)	
			20.405(a)(1)(iii)				80.73(a)(2)(i)				80.73(a)(2)(vii)(A)					
			20.405(a)(1)(iv)				80.73(a)(2)(ii)				80.73(a)(2)(vii)(B)					
			20.405(a)(1)(v)				80.73(a)(2)(iii)				80.73(a)(2)(i)					
LICENSEE CONTACT FOR THIS LER (12)																
NAME R A Fenech, Technical Engineer, Palisades										TELEPHONE NUMBER AREA CODE 6 1 6 7 6 4 - 8 9 1 3						
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDOS						
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)

On October 8, 1985, with the Plant at 98 percent power, an error was identified in the scheduled date for a main steam and feedwater system hydrostatic test. Technical Specifications require the test through a reference to the ASME Boiler and Pressure Vessel Code. A misinterpretation of the code requirements resulted in a scheduled test date that exceeded the prescribed time interval.

A prompt review determined that the overdue test did not result in an unsafe condition. Therefore, plant operation was not precluded by this occurrence.

Pending NRC approval of our November 1, 1985 Request for Relief, a main steam and feedwater system leak test is proposed to be performed during the 1985 refueling outage. A review of the Pump and Valve Test Program and the Hydrostatic and Leak Test Program was performed. No major deficiencies were identified in these programs.

The Inservice Inspection program and the Palisades Technical Specifications provide additional test requirements for the main steam and feedwater systems. Based on the results of these tests, plant operation was allowed to continue with no additional risk to the public health and safety.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
PALISADES PLANT	0 5 0 0 0 2 5 5	8 5	0 2 0	0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 308A's) (17)

On October 8, 1985, with the Plant at 98 percent power, an error was identified in the scheduled date for a main steam and feedwater system hydrostatic test [SB] [SJ]. Technical Specifications require the test through a reference to the ASME Boiler and Pressure Vessel Code. A misinterpretation of the code requirements resulted in a scheduled test date that exceeded the prescribed time interval. A prompt review determined that the overdue test did not constitute an unreviewed safety question. Therefore, plant operation was not affected by this occurrence.

Technical Specification 4.3.b states that the structural integrity of ASME Class 1, 2 and 3 components, as determined by 10CFR50.55a and Regulatory Guide 1.26, shall be verified and maintained at an acceptable level, in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, with applicable addenda as required by 10CFR50.55a(g), except where specific relief has been granted by the NRC. The ASME Boiler and Pressure Vessel Code, Section XI, requires periodic system pressure tests for ASME Class 1, 2 and 3 systems and components. IWC-2500 requires a hydrostatic test at the end of each inspection interval or during the same period of each inspection interval.

In 1977, the Plant updated to the 74575 Edition and Addenda of Section XI. Plant personnel interpreted the requirements of this update to be a hydrostatic test within a ten year interval of the date the requirement was instituted for the Plant. This interpretation would necessitate a hydrostatic test between 1977 and 1987. The test was scheduled to ensure completion prior to 1987.

Contrary to this interpretation, the ten year inspection interval begins at the start of commercial operation and extends for ten calendar years, plus or minus one year. In addition, for units continuously out of service for greater than six months, the interval can be extended by the length of the outage. Based on this interpretation of the code requirements and including allowable extensions, the first inspection interval for the Plant ended in November of 1983. Therefore, the main steam and feedwater hydrostatic test should have been completed at or before November of 1983.

The occurrence was evaluated by the Plant Review Committee and continued operation was determined to be acceptable. By letter dated November 1, 1985, Consumers Power Company requested relief to either perform the system hydrostatic test during the 1987 refueling outage or provide adequate technical justification for permanent relief. A system leak test will be performed during the 1985-86 refueling outage in lieu of the ten year hydrostatic test. A review of the Pump and Valve Test Program and the Hydrostatic and Leak Test Program was performed. No major deficiencies were identified in these programs.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO 3150-0104

EXPIRES 8/31/85

FACILITY NAME (1) PALISADES PLANT	DOCKET NUMBER (2) 0 5 0 0 0 2 5 5 8 5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 5	0 2 0	0 0	0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 368A's) (17)

In addition to pressure tests, the Inservice Inspection Program requires periodic non-destructive examination of the main steam and feedwater systems. Technical Specifications augment the Inservice Inspection program with conservative examination requirements regarding the main steam and feedwater systems. During the first ten year interval, these inspections did not identify any conditions detrimental to system integrity. During the 1983 refueling outage, volumetric examinations were completed on the steam generator shell welds, with satisfactory results. In addition, a complete main steam and feedwater leak test was performed in accordance with Section XI during the same refueling outage. The leak test is performed at a pressure less than the hydrostatic test pressure. Based on this inspection history, this occurrence did not result in any additional risk to public health or safety.



Consumers
Power
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

November 7, 1985

US Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
LICENSEE EVENT REPORT 85-020 - FAILURE TO PERFORM HYDROSTATIC TESTING

Licensee Event Report (LER) 85-020(Failure to Perform Hydrostatic Testing) is attached. This event is reportable to the NRC per 10CFR50.73(a)(2)(ii).

Brian D. Johnson

Brian D Johnson
Staff Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachment

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