

OCT 24 1980

Docket No. 50-255

US NRC
DISTRIBUTION SERVICES
BRANCH

1980 NOV 7 PM 2 58

RECEIVED DISTRIBUTION
SERVICES UNIT

Mr. David P. Hoffman
Nuclear Licensing Administrator
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Dear Mr. Hoffman:

SUBJECT: ORDER FOR MODIFICATION OF LICENSE CONCERNING ENVIRONMENTAL
QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT (SEP
TOPIC III-12) - PALISADES PLANT

Ref. (a) Commission Memorandum and Order of May 23, 1980 (80-CLI-21)
Ref. (b) Inspection and Enforcement Bulletin Supplement No. 2 to
IEB-79-01B, September 30, 1980.

This letter transmits an Order for Modification of License which changes the Technical Specifications for the Palisades Plant. This change is a result of Ref. (a) which required the staff to codify the documentation requirements for the qualification of safety-related electrical equipment. A copy of the Order is being filed with the Office of the Federal Register for publication.

The deadline of November 1, 1980 for submittal of the qualification information is not changed by this Order. Some additional information regarding the file is contained in Ref. (b). Questions regarding this Order should be directed through your Project Manager.

Sincerely,

ORIGINAL SIGNED BY

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
Order (w/attachments)

cc w/enclosure: See Next Page

8011110500

G

OFFICE	DL:ORB #5/LA	DL:ORB #5/PM	DL:ORB #6/C	DL:ORB #2/PM	DL:DIR
SURNAME	HS Smith	Twambach	DCrutchfield	MW Williams	DTsenhut
DATE	10/24/80	10/24/80	10/24/80	10/24/80	10/24/80

Distribution:

Docket	H. Smith
NRC PDR	J. Roe
Local PDR	S. Norris
ORB #5 Reading	M. Williams
NRR Reading	OELD
H. R. Denton	OI&E (3)
E. G. Case	B. Jones (4)
R. Hartfield, MPA	ACRS (16)
G. Bennington, MPA	OPA (Clare Miles)
D. Eisenhower	NSIC
R. Purple	TERA
T. Novak	Secretariat (SECY)
R. Tedesco	R. Diggs
G. Lainas	J. Heltemes, AEOD
J. Murray, OELD	Project Manager
D. Crutchfield	Gray File
G. Cwalina	Xtra Cys (6)
	J. Murray



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 24, 1980

Docket No. 50-255

Mr. David P. Hoffman
Nuclear Licensing Administrator
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Dear Mr. Hoffman:

SUBJECT: ORDER FOR MODIFICATION OF LICENSE CONCERNING ENVIRONMENTAL
QUALIFICATION OF SAFETY-RELATED ELECTRICAL EQUIPMENT (SEP
TOPIC III-12) - PALISADES PLANT

Ref. (a) Commission Memorandum and Order of May 23, 1980 (80-CLI-21)
Ref. (b) Inspection and Enforcement Bulletin Supplement No. 2 to
IEB-79-01B, September 30, 1980.

This letter transmits an Order for Modification of License which changes the Technical Specifications for the Palisades Plant. This change is a result of Ref. (a) which required the staff to codify the documentation requirements for the qualification of safety-related electrical equipment. A copy of the Order is being filed with the Office of the Federal Register for publication.

The deadline of November 1, 1980 for submittal of the qualification information is not changed by this Order. Some additional information regarding the file is contained in Ref. (b). Questions regarding this Order should be directed through your Project Manager.

Sincerely,

A handwritten signature in black ink that reads "Dennis M. Crutchfield".

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
Order (w/attachments)

cc w/enclosure: See Next Page

~~8011110~~ 306

cc w/enclosure:

M. I. Miller, Esquire
Isham, Lincoln & Beale
Suite 4200
One First National Plaza
Chicago, Illinois 60670

Mr. Paul A. Perry, Secretary
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Judd L. Bacon, Esquire
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Myron M. Cherry, Esquire
Suite 4501
One IBM Plaza
Chicago, Illinois 60611

Ms. Mary P. Sinclair
Great Lakes Energy Alliance
5711 Summerset Drive
Midland, Michigan 48640

Kalamazoo Public Library
315 South Rose Street
Kalamazoo, Michigan 49006

Township Supervisor
Covert Township
Route 1, Box 10
Van Buren County, Michigan 49043

Office of the Governor (2)
Room 1 - Capitol Building
Lansing, Michigan 48913

Director, Technical Assessment
Division
Office of Radiation Programs
(AW-459)
U. S. Environmental Protection
Agency
Crystal Mall #2
Arlington, Virginia 20460

U. S. Environmental Protection
Agency
Federal Activities Branch
Region V Office
ATTN: EIS COORDINATOR
230 South Dearborn Street
Chicago, Illinois 60604

Charles Bechhoefer, Esq., Chairman
Atomic Safety and Licensing Board
Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. George C. Anderson
Department of Oceanography
University of Washington
Seattle, Washington 98195

Dr. M. Stanley Livingston
1005 Calle Largo
Santa Fe, New Mexico 87501

Resident Inspector
c/o U. S. NRC
P. O. Box 87
South Haven, Michigan 49090

Palisades Plant
ATTN: Mr. J. G. Lewis
Plant Manager
Covert, Michigan 49043

William J. Scanlon, Esquire
2034 Pauline Boulevard
Ann Arbor, Michigan 48103

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of Consumers Power
Company
Palisades Plant

)
)
)

Docket No. 50-255

ORDER FOR MODIFICATION OF LICENSE

I.

Consumers Power Company (the licensee) is the holder of Provisional Operating License No. DPR-20, which authorizes the operation of the Palisades Plant at steady state reactor power levels not in excess of 2530 megawatts thermal (rated power). The facility consists of a pressurized water reactor located at the licensee's site in Covert Township, Van Buren County, Michigan.

II.

On November 4, 1977, the Union of Concerned Scientists (UCS) filed with the Commission a "Petition for Emergency and Remedial Relief." The petition sought action in two areas: fire protection for electrical cables, and environmental qualification of electrical components. By Memorandum and Order dated April 13, 1978 (7 NRC 400), the Commission denied certain aspects of the petition and, with respect to other aspects, ordered the NRC staff to take several related actions. UCS filed a Petition for Reconsideration on May 2, 1978. By Memorandum and Order, dated May 23, 1980, the Commission reaffirmed its April 13, 1978 decision regarding the possible shutdown of operating reactors. However, the Commission's May 23, 1980 decision directed licensees and the NRC staff to undertake certain actions.

With respect to environmental qualification of safety-related electrical equipment, the Commission determined that the provisions of the two staff documents - the Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines) and NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment," December 1979 (copies attached) "form the requirements which licensees and applicants must meet in order to satisfy those aspects of 10 CFR Part 50, Appendix A General Design Criterion (GDC-4), which relate to environmental qualifications of safety-related electrical equipment." The Commission directed, for replacement parts in operating plants, "unless there are sound reasons to the contrary, the 1974 standard in NUREG-0588 will apply." The Commission also directed the staff to complete its review of the information sought from licensees by Bulletin 79-01B¹ and to complete its review of environmental qualification of safety-related electrical equipment in all operating plants, including the publication of Safety Evaluation Reports, by February 1, 1981. The Commission imposed a deadline that, "by no later than June 30, 1982 all safety-related electrical equipment in all operating plants shall be qualified to the DOR Guidelines or NUREG-0588."

1

Bulletin 79-01B was not sent to licensees for plants under review as part of the staff's Systematic Evaluation Program. The information sought by Bulletin 79-01B was requested from these licensees by a series of letters and meetings during the months of February and March, 1980.

The Commission requested the staff to, "keep the Commission and the public apprised of any further findings of incomplete environmental qualification of safety-related electrical equipment, along with corrective actions taken or planned," and requested the staff to provide bi-monthly progress reports to the Commission.

The Commission further directed that, "In order to leave no room for doubt on this issue, the staff is to prepare additional Technical Specifications for all operating plants which codify the documentation requirement paragraph of the Guidelines (paragraph 8.0)." The staff was directed to add these documentation requirements to each license after they were approved by the Commission.

The Commission also pointed out that the various deadlines imposed in its Order, "do not excuse a licensee from the obligation to modify or replace inadequate equipment promptly."

III.

The Commission has approved the Technical Specification provisions set forth in Section IV below which specify documentation requirements and which specifically impose on the licensee the requirement of the Commission's May 23, 1980 Memorandum and Order that by no later than June 30, 1982 all safety-related electrical equipment shall be qualified to the DOR Guidelines or NUREG-0588.

The information developed during the Commission review of the UCS Petition emphasizes the importance of prompt completion of the upgrading of

environmental qualification of safety-related electrical equipment to conform to the DOR Guidelines or NUREG-0588 and of adequate documentation of equipment qualifications. The deadlines set forth in the Commission's Memorandum and Order dated May 23, 1980, assure that such upgrading will be accomplished promptly. In order to assure prompt completion of necessary qualification work or replacement of unqualified components, if necessary, in conformance with the requirements of the Commission's Memorandum and Order dated May 23, 1980, and to provide complete and adequate documentation as promptly as possible, such upgrading and documentation work must commence immediately. Therefore, I have concluded that the public health, safety and interest require this Order for Modification of License to be effective immediately.

IV.

Accordingly, pursuant to the Atomic Energy Act of 1954, as amended, and the Commission's Rules and Regulations in 10 CFR Parts 2 and 50, IT IS ORDERED THAT EFFECTIVE IMMEDIATELY Provisional Operating License No. DPR-20 is hereby amended to add the following provisions to the Appendix A Technical Specifications.

- (a) "By no later than June 30, 1982, all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588, "Interim Staff Position on Environmental

Qualification of Safety-Related Electrical Equipment," December 1979. Copies of these documents are attached to Order for Modification of License No. DPR-20 dated October 24, 1980.

- (b) "By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified."

To effectuate the foregoing, appropriate pages for incorporation into the Technical Specifications are attached to this Order.

V

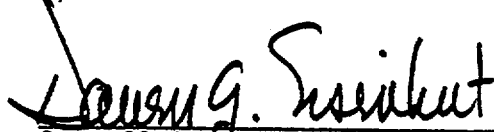
The licensee or any person whose interest may be affected by this Order may request a hearing within 20 days of the date of publication of this Order in the Federal Register. Any request for a hearing will not stay the effective date of this Order. Any request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy of the request should also be sent to the Executive Legal Director, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, and to Judd L. Bacon, Esquire, Consumers Power Company, 212 West Michigan Avenue, Jackson, Michigan, attorney for the licensee.

If a hearing is held concerning this Order, the issues to be considered at the hearing shall be:

- a. whether the licensee should be required to have the environmental qualification records referred to in Section IV, above, available at a central location by no later than December 1, 1980; and
- b. whether all safety-related electrical equipment should be qualified as required in Section IV, above, by no later than June 30, 1982.

Operation of the facility on terms consistent with this Order is not stayed by the pendency of any proceedings on the Order.

FOR THE NUCLEAR REGULATORY COMMISSION



Darrell G. Wisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Effective Date: October 24, 1980
Bethesda, Maryland

Attachments:

1. Technical Specification Pages
2. Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors
3. NUREG-0588, Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment.

- e. Records of training and qualification for current members of the plant staff.
- f. Records of reactor tests and experiments.
- g. Records of changes made to Operating Procedures.
- h. Records of radioactive shipments.
- i. Records of sealed source leak tests and results.
- j. Records of annual physical inventory of all source material of record.
- k. Chlorine treatment records.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of monthly radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- f. Records of inservice inspections performed pursuant to these Technical Specifications.
- g. Records of Quality Assurance activities required by the QA Manual to be retained for the duration of the facility operating license.
- h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- i. Records of meetings of the PRC and SARB.
- j. Records of monthly facility radiation and contamination surveys.
- k. Records for environmental qualification which are covered under the provisions of paragraph 6.14.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR, Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.13 FIRE PROTECTION INSPECTION

- 6.13.1 An independent fire protection and loss prevention inspection shall be performed annually utilizing either qualified off-site licensee personnel or an outside protection firm.
- 6.13.2 An inspection by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.

6.14 ENVIRONMENTAL QUALIFICATION

1. By no later than June 30, 1982 all safety-related electrical equipment in the facility shall be qualified in accordance with the provisions of: Division of Operating Reactors "Guidelines for Evaluating Environmental Qualification of Class IE Electrical Equipment in Operating Reactors" (DOR Guidelines); or, NUREG-0588 "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", December 1979. Copies of these documents are attached to Order for Modification of License DPR-20 dated October 24, 1980.
2. By no later than December 1, 1980, complete and auditable records must be available and maintained at a central location which describe the environmental qualification method used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with the DOR Guidelines or NUREG-0588. Thereafter, such records should be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified.