



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

August 23, 1984

Docket No. 50-255
LS05-84-08-032

Mr. David J. Vandewalle
Nuclear Licensing Administrator
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Vandewalle:

SUBJECT: SUPPLEMENT 1 TO NUREG-0737: REQUEST FOR MODIFICATION OF
COMMISSION ORDER DATED JUNE 12, 1984

RE: Palisades Plant

By letter dated June 29, 1984, as supplemented by letter dated July 17, 1984, you requested that we extend the completion dates for certain items contained in the Commission Order dated June 12, 1984, relating to Supplement 1 to NUREG-0737. Specifically, you requested that the dates for submitting the final report describing how Regulatory Guide (RG) 1.97 requirements of Supplement 1 to NUREG-0737 have or will be met and for providing an implementation schedule for the RG 1.97 requirements be extended from August 1984 to May 1986. The Commission Order allows an extension of time to be granted by the Director, Division of Licensing, for good cause shown.

Your September 16, 1983 submittal concluded that 73 of the 80 RG 1.97 variables satisfy the guidelines. The seven remaining items are to be resolved according to the revised schedule.

You have stated that the revised schedule represents a major rearrangement of the work activities to utilize information being provided by your function and task analysis effort in the Emergency Operating Procedure (EOP) and Detailed Control Room Design Review (DCRDR) programs. The function and task analysis effort was redirected to incorporate NRC staff guidance following a meeting on February 9, 1984. The revised plan for the function and task analysis was presented at a meeting on May 2, 1984. The relationship between RG 1.97 and the function and task analysis was discussed at the May meeting.

Your revised schedule indicates that the DCRDR summary report will be completed by May 1985, and the upgraded EOP's will be validated by a simulator walkthrough by December 1985. The results of these two programs will then be used in the resolution of the seven open items identified in your September 16, 1983 and July 17, 1984 submittals.

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Mr. David J. Vandewalle

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We find that the proposed rearrangement of work activities is consistent with a proper sequence of events to meet the requirements of Supplement 1 to NUREG-0737. Furthermore, we find that you have shown a good faith effort by providing a safety analysis report dated September 16, 1983 which identified deviations and exceptions to RG 1.97 including the seven open items which remain to be resolved. Therefore, in accordance with the terms of the June 12, 1984 Commission Order, we conclude that there is adequate justification for modification of the Commission's Order and hereby grant the requested delays.

In regard to your September 16, 1983 submittal, we have received a Technical Evaluation Report from our contractor that is currently under staff review. There appears to be a number of items, other than the above seven, in your September 16, 1983 submittal that will require further clarification. We will be requesting additional information on these items in the near future and expect to resolve these items on a separate schedule that is more timely than that discussed above.

Sincerely,
Original Signed By:

For *FNuaglia*
Darrell G. Eisenhut, Director
Division of Licensing

cc: See next page

Docket	JNGrace
NRC PDR	ACRS (10)
Local PDR	SEPB
ORB Reading	DEisenhut
NSIC	ORAB
WPaulson	TBarnhart (4)
CJamerson	OPA, CMiles
PM	SECY
OELD	RDiggs
ELJordan	

For
DL: *DEisenhut*
8/23/84

DL: ORB#5
CJamerson: *cb*
8/21/84

WAP
DL: ORB#5
for JLyons
8/24/84

DL: ICSB
JJoyce *JJ*
8/22/84

WAP
DL: ORB#5
WPaulson
8/22/84

DL: AD/SA
DC: *Weld*
8/23/84

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We find that the proposed rearrangement of work activities is consistent with a proper sequence of events to meet the requirements of Supplement 1 to NUREG-0737. Furthermore, we find that you have shown a good faith effort by providing an interim report of deviations which identifies the open items which remain to be resolved. Therefore, in accordance with the terms of the June 12, 1984 Commission Order, we conclude that there is adequate justification for modification of the Commission's Order and hereby grant the requested delays.

In regard to your Interim Report of Deviations, we have received an interim report on your submittal from our contractor that is currently under staff review. There appears to be a number of items in your September 16, 1983 submittal that will require further clarification. We will be requesting additional information on these items in the near future and expect to resolve these items on a separate schedule that is more timely than that discussed above.

Sincerely,

Darrell G. Eisenhut, Director
Division of Licensing

cc: See next page

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DCrutchfield
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Mr. David J. Vandewalle

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August 23, 1984

cc

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Federal Activities Branch
Region V Office
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c/o U.S. NRC
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