

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-255/79-04

Docket No. 50-255

License No. DPR-20

Licensee: Consumers Power Company  
212 West Michigan Avenue  
Jackson, MI 49201

Facility Name: Palisades Nuclear Generating Plant

Inspection At: Palisades Site, Covert, MI

Inspection Conducted: February 20-23, 1979

Inspector: B. L. Jorgensen

3-6-79

Approved By: R. F. Warnick  
R. F. Warnick, Chief  
Reactor Projects Section 2

3-6-79

Inspection Summary

Inspection on February 20-23, 1979 (Report No. 50-255/79-04)

Areas Inspected: Routine, unannounced inspection of plant operations, QA program annual review, reportable events, and action on previously identified items. The inspection involved 26 inspection hours onsite by one NRC inspector.

Results: Of the four areas inspected, no items of noncompliance were identified in three areas. One item of noncompliance (Infraction - failure to implement procedures - Paragraph 3) was identified in one area.

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DETAILS

1. Persons Contacted

\*J. Lewis, Plant Superintendent  
\*H. Keiser, Operations and Maintenance Superintendent  
K. Berry, Technical Superintendent  
\*R. McCaleb, Quality Assurance Superintendent  
B. Shaner, Operations Supervisor  
T. Kanicki, Shift Supervisor  
S. Ghidotti, Shift Supervisor  
F. Butler, Instrument and Control Engineer  
W. Staley, Instrument and Control Supervisor  
\*G. Petitjean, Technical Engineer

\*Denotes those present at management interview on February 23, 1979.

The inspector also interviewed several licensed reactor operators on shift duty.

2. Licensee Actions on Previous Inspection Findings

(Closed) Noncompliance Item (50-255/78-26): Training records inadequate to show completion of required training. The inspector reviewed licensee corrective action as stated in his letter of December 19, 1978. The review included an examination of procedure revisions and implementation schedules, and discussions with licensee personnel.

(Closed) Open Item (50-255/77-14): Calibration program for safety-related instrumentation for which calibration frequencies are not specified in technical specifications. The licensee has identified the referenced instrumentation, established calibration frequencies, and is implementing the program.

(Closed) Open Item (50-255/78-27): Operability of boric acid heat tracing system. The licensee has completed identification and repair of all circuit "legs" on safety-related flow paths except for one redundant "leg" on the boric acid gravity feed line, which can be repaired only during a unit outage. Weekly current checks are continuing, with no newly failed circuits being identified. With this program in effect, the inspector has no further questions concerning whether or not required temperatures can be maintained in safety-related flow paths.

### 3. Reportable Events

The inspector reviewed the circumstances surrounding LER 79-05, relating to emergency diesel-generator (EDG) inoperability. The 1-1 EDG was considered inoperable on January 3, 1979 after a drain valve in the fuel system broke during routine testing of the diesel and the unit was sprayed with fuel oil. The failed drain valve was a recent installation, having been installed in place of a drain plug on the diesel fuel oil filter on November 28, 1978, during a maintenance activity.

Licensee Administrative Procedures provide for control of minor field changes during maintenance, stipulating use of the Specification/Field Change Form (SFC) to provide documentation, assure appropriate review, and obtain prior approval. In this case, however, no SFC form was initiated and the required reviews and approvals were not obtained. In that Technical Specification 6.8.1 requires implementation of the Administrative Procedures noted above, failure to initiate the SFC and to review and approve the modification is considered an item of noncompliance with Technical Specification 6.8.1.

The EDG 1-1 was inspected to verify it had been returned to the original condition and was operable. Inspection of EDG 1-2 verified this modification had not been made on that unit. The licensee is examining the lube oil and fuel oil systems on both diesels to ascertain whether other system changes of the type discussed above have occurred. This review and other licensee actions underway to disposition LER 79-05 will be examined during a future inspection.

### 4. Facility Operations

The inspector reviewed operations records and activities to verify compliance with licensee requirements.

- a. Shift Supervisor's Log: January and February, 1979.
- b. Secondary Plant Log: December, 1978 and January, 1979.
- c. Reactor Log: December, 1978 and January, 1979.
- d. Jumper/Bypass Log and Caution Tag Record.
- e. Bypass Control Checklists.

The Caution Tag Record was cross-checked against placement of sets of Caution Tags in a dozen examples and found accurate in each case.

The Bypass Control Checklists were reviewed to ascertain corrective action on questionable items identified during a previous inspection.<sup>1/</sup> The number of "open" Checklists has been reduced considerably, with those remaining appearing accurate. Operating staff cognizance of bypass status was considered good. The inspector noted the operating shift supervisors are performing scheduled routine reviews of caution tagging and plant jumper and bypass controls, as well as initialing Bypass Control Checklists before bypass installation. Finally, the record showed no temporary bypasses installed in safety-related systems.

The inspector also observed shift manning, routine operations, and shift turnover.

No items of noncompliance or deviations were identified.

##### 5. Quality Assurance Program Review

This inspection included an examination of and discussions relating to licensee implementation of changes made to the Quality Assurance Program (Consumers Power Company Topical Report CPC-1-A) during 1978. Changes to QA Program Procedures were reviewed by the inspector as they were made, to verify consistency with the QA Program. These changes were primarily editorial or organizational in nature. No problem areas were identified in this review.

Revision 7 to the Quality Assurance Program was accepted by the NRC on December 22, 1978. This revision addresses organizational and programmatic changes which have little effect on day-to-day operation of the QA program at the Palisades Plant. Discussions verified mechanisms exist to keep plant personnel aware of, and in some cases, involved in program changes. Mechanisms are also in place to revise implementing procedures as required to accomodate QA Program changes and to provide review of other procedure revisions to assure consistency with QA Program requirements.

The licensee's program for certification of QA auditors and lead auditors was also reviewed during this inspection, in followup to previous inspection findings.<sup>2/3/</sup> This function is controlled in accordance with Quality Assurance Department (Production and Transmission) Procedure No. XVIII-4 "Certification of Quality

1/ IE Inspection Report No. 050-255/78-17.

2/ IE Inspection Report No. 050-255/75-19.

3/ IE Inspection Report No. 050-255/77-14.

"Assurance Audit Personnel," dated February 8, 1978. Based on review of this procedure and discussion of its implementation with the licensee, this item is considered closed.

No items of noncompliance or deviations were identified.

6. Management Interview

A management interview, attended by licensee personnel noted in Paragraph 1, was conducted at the conclusion of the inspection on February 23, 1979. The inspector summarized the scope and findings of the inspection, specifically identifying the apparent item of noncompliance.