



**Consumers
Power
Company**

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November 19, 1979

Director, Nuclear Reactor Regulation
Att Mr Dennis L Ziemann, Chief
Operating Reactors Branch No 2
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - CHALLENGES TO
ENGINEERED SAFEGUARDS SYSTEMS

The NRC informed Consumers Power Company in letters dated July 26 and September 21, 1979 of an event at another PWR facility wherein an operator error caused a reactor trip, which was followed by a number of equipment failures resulting in an inadvertent challenge to safeguards systems.

The NRC requested that Consumers Power Company take certain actions as a result of this occurrence. The requested actions and our responses are as follows:

Item 1

You and your plant supervisors should review the events described in this letter to determine whether similar errors have occurred or could occur at your facility and whether the potential exists for a problem associated with occurrences that you have not previously considered.

Response 1

This occurrence has been reviewed by appropriate supervisory personnel and engineering staff personnel who are involved in test development. No evidence of similar personnel errors which could result in a similar occurrence was noted in this review.

Item 2

In addition, it is requested that management policies and procedures be reviewed and strengthened as necessary to assure that multiple equipment failures in safety-related systems will be vigorously pursued and analyzed to identify potential failure modes not previously considered that could lead to

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a significant reduction in the ability of safety systems to function as required.

Response 2

Topical Report CPC-1A describes the Consumers Power Company Quality Assurance Program. This program, as amplified by Quality Assurance and plant procedures, requires a corrective action system to address failures in systems and equipment which are important to safety. This corrective action system, which is a "graded system" as described in Topical Report CPC-1A, would place greater emphasis on related multiple equipment failures in safety-related systems.

Item 3

Finally, you are requested to review your engineered safety system surveillance procedures to determine whether appropriate cautions are included and to ensure that plant operators and supervisors are aware of the importance of avoiding challenges to the protective features of your facility.

Consumers Power Company has initiated an extensive and comprehensive review of all plant procedures as required by the modification to the Palisades Plant operating license dated November 9, 1979. Reviews of operating procedures and supplemental training of plant personnel following the TMI incident have provided additional assurance that plant operators and supervisors are aware of the importance in avoiding challenges to the protective features of our plant. These actions adequately respond to the requested action.



David P Hoffman
Nuclear Licensing Administrator

CC JGKeppler, USNRC