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Docket No. 50-255

FEB 05 1980

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

Dear Mr. Hoffman:

On January 17 and 18, 1980, we visited Palisades Plant to review your implementation of the Category A lessons learned requirements. Specific items which we determined needed further licensee action/clarification were discussed and a list of these items is enclosed. Additional detail has been provided in some cases.

Since it is our intent to complete the review of Category A lessons learned implementation prior to the restart of your facility, please provide a written response addressing each of the items within 10 days from the date of this letter.

Sincerely,

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors

Enclosure:
Request for Additional Information

cc w/enclosure:
See next page

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OFFICE	DOR:ORB #2	LLTF	DOR:ORB #2			
SURNAME	RDSilver:ah	CNelson	DLZiemann			
DATE	2/5/80	2/5/80	2/5/80			

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

February 5, 1980

Docket No. 50-255

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Operating Reactors Branch #2
Division of Operating Reactors

Enclosure:
Request for Additional
Information

cc w/enclosure:
See next page

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

PALISADES

IMPLEMENTATION OF SHORT TERM LESSONS LEARNED REQUIREMENTS
ITEMS TO BE COMPLETED PRIOR TO PLANT STARTUP

2.1.1 EMERGENCY POWER SUPPLIES

- Provide sufficient pressurizer heater capacity, powered from both onsite emergency power supplies, to operate in the natural circulation mode.
- Complete PORV and block valve power supply modifications.

2.1.3a VALVE POSITION INDICATION

- Complete installation of valve position indicators.
- Provide alarm (actuation) setpoints for acoustic monitors.
- Provide justification for alarm setpoints including demonstration that acoustic monitors on a closed relief line will not alarm during relief through another line.
- Identify non-qualified parts of the valve position indication system and provide schedule for qualification.
- Incorporate use of valve position indicators in operating procedures.

2.1.3b INSTRUMENTATION FOR INADEQUATE CORE COOLING

- Complete installation of subcooling meters.
- Develop and implement procedures for determining subcooled margin using meters as well as backup methods.
- Provide a commitment to upgrade qualifications and ranges of the subcooling meters (including pressure and temperature inputs) to RG1.97. Provide schedule.

2.1.4 CONTAINMENT ISOLATION

- Justify the acceptability of installed radiation detection as a diverse containment isolation signal (Bechtel Report).
- Justify the lack of automatic isolation of the component cooling water system although it is classified as a non-essential system
- Inadequate justification has been presented to support the acceptability of the check valve outside containment meeting the automatic isolation requirement for the non-safety grade instrument air system.

- Update documents submitted to NRC.

2.1.5c HYDROGEN RECOMBINER PROCEDURES

- Revise procedures to provide basis for recombiner operation in addition to containment air sample.

2.1.6a SYSTEMS INTEGRITY

- Include CVCS and Gaseous Waste System in the leak reduction and preventative maintenance programs or justify why these systems will not be used for accident mitigation or recovery.
- Include the RCS sample system in leak reduction and preventative maintenance program.
- Provide individual system leakage rates for all systems tested.
- Assure the long term leak reduction (preventative maintenance) program is incorporated into the plant operating procedures.

2.1.6b PLANT SHIELDING

- If necessary, pending review for 2.1.6a, include CVCS and Gaseous Waste System in this design review.
- Include RCS sampling system in this design review.

Note - These items not required for startup.

2.1.7b AFW FLOW INDICATION

- Complete installation of modifications.

2.1.8a SAMPLING

- Implement procedures for obtaining RCS sample.
- Complete modifications and implement procedures for obtaining containment air samples.

2.1.8b EFFLUENT MONITORS

- The October 30, 1979 letter from H. Denton (pgs. 33-35) contains a list of specific information required for estimating Noble Gas and Radioiodine and Particulate Effluents. Provide the required information for all monitored locations.

- Assure that steam release monitoring will provide adequate estimates of releases from all steam dumps. (Note: steam release is to be monitored for noble gases only.)

2.1.8c PORTABLE IODINE INSTRUMENTATION

- Implement procedures to specify that iodine samples be taken in all areas occupied by essential personnel following an accident.

2.2.1a SHIFT SUPERVISOR RESPONSIBILITIES

- Justify allowing the shift supervisor to leave the control room during an accident.

- Modify Administrative Procedures to clearly specify the requirements of part 2.c of this item.

- Update documents submitted.

2.2.1b SHIFT TECHNICAL ADVISOR

- STA should evaluate LER's from other plants.

2.2.2b TECHNICAL SUPPORT CENTER

- Install phone jacks in TSC (both locations).

- Provide plant data in TSC.

- Illustrate lines of communication (onsite) during accident in Emergency Plan Implementation Procedures.

- Implement procedures for accomplishing TSC function should one portion of TSC become uninhabitable.

- Implement procedures for monitoring radiation per item 2.1.8c.

2.2.2c OPERATIONAL SUPPORT CENTER

- Update submittal to show OSC in actual location.

- Implement procedures for monitoring radiation per item 2.1.8c.

- Provide communications between control room and OSC.