



Consumers
Power
Company

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February 29, 1980

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Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - IE INSPECTION
REPORT 79-19

Consumers Power Company's response to the alleged discrepancies noted in IE
Inspection Report 79-19 dated February 8, 1980 are as follows:

Item 1

10 CFR 20.101(a) places a limit of 1.25 rem per calendar quarter on an individual's occupational dose to the whole body. The exception provided for by 10 CFR 20.101(b), which permits quarterly whole body dose from occupational exposure up to 3 rem if the accumulated whole body dose does not exceed 5 (N-18), does not apply to eighteen-year-old individuals, as "N" is defined as the individual's age in years at his last birthday.

Contrary to the above, the licensee reported by letter dated October 26, 1979 that an eighteen-year-old worker had received 1.7 rems during the third calendar quarter of 1979. This whole body dose exceeds the applicable 1.25 rem limit.

Response to Item 1

A response to Item 1 is not required nor requested by IE Inspection Report 79-19.

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Item 2

Technical Specifications 6.8.1 and 6.11.1 require that radiation protection procedures be implemented and adhered to. Procedure H.P. 8.4, "Whole Body Counting Program," in Section 5.2.1, "Exit Whole Body Counting," states, "All personnel, whether permanent or temporary, will be whole body counted at the time of their film badge termination unless the plant health physicist deems a count not necessary based on the work performed and the area it was performed in by the individual."

Contrary to the above, a worker who had worked in containment and the steam generator during the early part of the current outage was not given a whole body count upon his termination following work on October 8, 1979.

Response to Item 2

Corrective action taken and results achieved: The individual in question was given a whole body count (WBC) on November 21, 1979. The results of the WBC showed the individual's total body burden to be less than one percent of recognized maximum permissible body burden levels.

Corrective action to be taken to avoid further noncompliance: The requirement to conduct a WBC upon film badge termination of each employee exceeded regulatory requirements, and was excessive in terms of providing sufficient data to evaluate the effectiveness of health physics practices. Accordingly, the procedure governing the WBC program (Procedure H.P. 8.4) has been revised to require "a substantive effort" to obtain a WBC upon employee termination. Implementation of the revised procedure will provide sufficient data to permit evaluation of the Palisades health physics program.

Date when full compliance will be achieved: The procedural revisions discussed above were reviewed and approved by the Plant Review Committee on February 20, 1980. This revised procedure will be issued by March 30, 1980.

Item 3

10 CFR 20.201(b) requires each licensee to make or cause to be made such surveys as may be necessary for him to comply with the regulation in this part. 10 CFR 20.201(a) defines a survey as used in the regulations to mean an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions. When appropriate, such evaluation includes a physical survey of the location of materials and equipment, and measurements of levels of radiation or concentrations of radioactive material present.

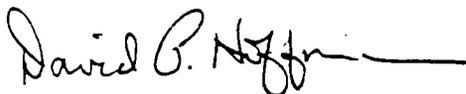
Contrary to the above, the licensee failed to make a proper evaluation for the presence of radioactive material in plant refuse being released to a landfill for burial in 1978 and possibly in early 1979.

Response to Item 3

Corrective action taken and results achieved: Consumers Power Company and the State of Michigan Division of Radiological Health have conducted surveys at landfill sites where powdered resins were buried or could have been buried. The surveys failed to detect any material from Palisades which exceeded the regulated levels.

Corrective action to be taken to avoid further noncompliance: Used powdered resins are now being disposed of as radioactive waste. Procedures used for monitoring vehicles leaving the Palisades Plant site have been revised to avoid inadvertent shipment of such radioactive material.

Date when full compliance will be achieved: The corrective measures discussed above have been implemented.



David P Hoffman
Nuclear Licensing Administrator

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