



**Consumers  
Power  
Company**

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July 23, 1980

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Office of Inspection and Enforcement  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - RESPONSE TO  
IE INSPECTION REPORT 80-08

Consumers Power Company's responses to alleged items of noncompliance noted in IE Inspection Report 80-08 dated July 1, 1980 are as follows:

Item 1

Technical Specification 3.17.1, via Table 3.17.4, requires four operable high pressure safety injection flow instruments. Technical Specification 3.17.2 requires the reactor be placed in hot shutdown in 12 hours and cold shutdown in 48 hours if minimum instrument operability requirements cannot be maintained or restored.

Contrary to the above, the licensee had only three operable high pressure safety injection flow instruments during the period from about March 2, 1978, to about May 8, 1979, and failed to perform the required actions.

Responses to Item 1

1. Corrective Action Taken and Results Achieved: At the time of discovery of the noncompliance, four HPSI flow instruments were operable and no action to correct the specific occurrence was necessary.
2. Corrective Action To Be Taken To Avoid Further Noncompliance: The following administrative controls have been implemented to prevent recurrence of this noncompliance item:

- Weekly, during plant operation, the Shift Technical Advisor (STA) reviews all items and tags in the Caution Tag Logbook. The scope of this

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review has been expanded to include verification that caution tagged equipment satisfies requirements of Technical Specifications LCOs.

- STAs review planned outages of safety-related equipment by reviewing the Equipment Outage Requests (EORs) and tagging requests.

- The shift turnover check sheet, for control room personnel, requires the listing of ESS equipment which is out of service..

3. Date When Full Compliance Will Be Achieved: The administrative controls described above have been implemented at the Palisades Plant.

#### Item 2

Technical Specification 6.8.1 requires implementation of procedures as recommended in Appendix "A" of Regulatory Guide 1.33 (November, 1972), which includes shift and relief turnover. The licensee's Administrative Procedure Section 4.0, Paragraph 5.2.1.2 concerning shift turnover for control operators requires the oncoming operator to review and sign the control operators' turnover checklist prior to assuming shift duties.

Contrary to the above, the turnover checklist was not signed by one of the oncoming "B" shift operators on May 29, 1980.

#### Responses to Item 2

1. Corrective Action Taken and Results Achieved: The status of items verified through the shift turnover checklist were satisfactory (as indicated by completed checklists) for the shifts immediately preceding and following the shift in question.
2. Corrective Action To Be Taken To Avoid Further Noncompliance: By memorandum dated July 15, 1980, Shift Supervisory personnel were instructed to verify proper completion of turnover check sheets performed during their shift.
3. Date When Full Compliance Will Be Achieved: The memorandum described above has been issued.

#### Item 3

Technical Specification 6.5.1.3 provides, in part, that alternate Plant Review Committee (PRC) members shall be appointed in writing by the PRC Chairman, to serve on a temporary basis.

Contrary to the above, for two different meetings of the PRC on May 5, 1980, alternate members participated, but were not appointed in writing as required.

Responses to Item 3

1. Corrective Action Taken and Results Achieved: The minutes for PRC meetings conducted in 1979 and 1980 are being reviewed to ascertain that alternates were properly designated. Where necessary, corrections will be made to meeting minutes.
2. Corrective Action To Be Taken To Avoid Further Noncompliance: The procedures governing minutes of PRC meetings have been reviewed to verify that they adequately address designation of alternate members. These procedural requirements have been reviewed with the PRC secretary, who is responsible for preparation of PRC meeting minutes.
3. Date When Full Compliance Will Be Achieved: The action described in 1 above will be completed by August 15, 1980.

David P Hoffman (Signed)

David P Hoffman  
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement  
NRC Resident Inspector-Palisades