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50-255

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State of Michigan
 ATTN: Hon. Frank J. Kelley
 Attorney General
 7th Floor, Law Bldg.
 Lansing, MI 48913

Department of Public Health
 Division of Radiological Health
 ATTN: Donald E. VanFarow
 Chief
 3500 N. Logan St.
 Lansing, MI 48909

Department of Commerce
 Public Service Commission
 ATTN: Daniel J. Demlow
 Chairman
 Long Commerce Park
 P.O. Box 30221
 Lansing, MI 48909



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

SEP 16 1980

Docket No. 50-255
EA-80-49

Consumers Power Company
ATTN: Mr. R. B. DeWitt
Vice President
Nuclear Operations
212 West Michigan Avenue
Jackson, MI 49201

Gentlemen:

This letter is in reference to two recent events at the Palisades nuclear power facility. On July 28, 1980, the NRC was notified that during the period from 7:36 p.m. on July 25 through 7:36 a.m. on July 27, 1980, containment sump isolation valve CV-3030 was open. The effect of this incorrect valve position during a loss of coolant accident (LOCA) would have been a degradation of the ECCS and containment cooling system. In addition, during a LOCA containment integrity would have been degraded for at least several minutes. An Immediate Action Letter was issued by the Region III office on July 31, 1980, confirming the specific short-term actions taken to correct the problem. On August 19, 1980, the NRC was notified that the Safety Injection Refueling Water (SIRW) tank outlet valve CV-3031 was cycled (from open to closed to open) in one train of the safeguard pumps during power operation. The effect of this brief (approximately two (2) minutes) incorrect positioning during a LOCA would have been a degradation of the ECCS and the containment cooling system.

These two events occurring within a period of a month demonstrated a continued weakness in your controls over licensed activities, specifically, controls over activities involving positioning of valves in systems important to safety. Our current concern is similar to our concerns expressed to you in our November 9, 1979 letter involving the misalignment of the containment purge bypass isolation valves. While I recognize that the 1979 matter is still under adjudication, I am concerned that the actions you took following that event to assure that valves were correctly positioned were not adequate to avoid those recent events which were caused in part by incomplete valve check lists and inattention to the importance of following procedures. Consequently, we propose to impose civil penalties for the items of noncompliance set forth in Appendix A to this letter in the amount of Sixteen Thousand Dollars. Appendix B to this letter is a Notice of Proposed Imposition of Civil Penalties.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 16 1980

Part of the initial function on each shift change is to review the operating panels to confirm proper alignment of systems important to safety. Considering the heightened attention given to detection of incorrect valve lineups as a result of the containment purge bypass line valves being found incorrectly positioned and in light of increased emphasis placed on shift and relief turnover procedures imposed by TMI short-term lessons learned requirements, it is of particular concern to us that once the error of July 25 was made, it was not recognized by the operator who made it, by other operators on that shift, or by the next succeeding four shift changes. To emphasize our concern in this area, we are providing copies of this letter to the licensed operators who were on watch when valve CV-3030 was out of position and to NRC's Operator Licensing Branch.

We recognize that licensee management, upon learning of the event early on July 28, 1980, began immediately to evaluate the matter, and upon determination of the potential significance of the event, made a prompt report to the NRC. However, we are concerned that more than one day elapsed after discovery that valve CV-3030 had been opened before the potential significance of the opened valve was recognized.

You are required to respond to this letter and in preparing your response you should follow the instructions in Appendices A and B. Please include in your response to this letter detailed information regarding your actions taken to prevent the occurrence of improper valve line-ups; actions taken to provide for prompt identification of improper valve line-ups should they occur (including instructions to operators during shift turnover); and actions taken to provide for prompt evaluation to determine the potential significance of a valve(s) being out of position.

As part of the immediate actions taken as a result of valve CV-3030 being found in an incorrect position, you committed to retraining of licensed reactor operators on the importance of avoiding valving errors. Clearly, further effort in this area is needed in light of the event reported on August 19, 1980, which represents a case where lack of attention by watchstanders to their assigned duties resulted in the brief mispositioning of valve CV-3031. In addition to the item of noncompliance regarding this event issued you (Item 4 of Appendix A), we are issuing a Notice of Violation to the licensed Senior Reactor Operator employed in the position of Shift Supervisor during the August 19, 1980 event involving the mispositioning of CV-3031. A copy of the Notice of Violation issued to the operator will be forwarded to you.

We are also requiring that you meet with Senior NRC representatives at a public meeting to be held near the Palisades facility to discuss the events, NRC concerns, and Consumers Power Company corrective actions. Arrangements for this meeting, which will be held after we have reviewed your response to this letter, will be made with you by J. G. Keppler, Director, Region III.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the Commission's Public Document Room.

Sincerely,

Original signed by
Victor Stello

Victor Stello, Jr.
Director
Office of Inspection
and Enforcement

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Proposed Imposition of Civil Penalties

cc: Charles E. Smith, Shift Supervisor
 Aaron F. Brookhouse, Shift Supervisor
 Enos I. Thompson, Shift Supervisor
 Jerry F. Ford, Reactor Operator
 William E. Drummond, Reactor Operator
 Dirk E. Wellington, Reactor Operator
 Richard S. Carter, Reactor Operator
 Gary L. Pothoff, Reactor Operator
 Walter E. Stearns, Reactor Operator
 Paul F. Collins, Operator Licensing Branch, NRR

WPU: SM
 9/5/80
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 (BROCK6)

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 9/5/80

SEBryan
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 SEBryan
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ELD
 ELD
 9/9/80

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 NCMoseley
 9/6/80

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 DThompson
 9/10/80

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 DD: IE
 RCDeYoung
 9/ /80

D: IE
 D: IE
 VStello
 9/ /80

*Telephone conference
 Jim Lieberman/Paul McKee*

*Telephone conference
 E. Noulins/2508*