



**Consumers
Power
Company**

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December 16, 1980

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Region III
U S Nuclear Regulatory Commission
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DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - RESPONSE TO
IE INSPECTION REPORT 80-021

IE Inspection Report 80-021 dated November 21, 1980, transmitted three apparent items of noncompliance found at the Palisades Plant. Our response to these infractions is as follows:

Item 1

Technical Specification 6.8.1.d. requires, in part, implementation of procedures as identified in Regulatory Guide 1.33, Appendix A, which includes procedures for the plant Fire Protection Program. The Fire Protection Plan implementing procedure, paragraph 8.4.3.2.d requires designation of a qualified individual as firewatch who must be present at the scene when welding, cutting, open flame-work, or major grinding is in progress.

Contrary to the above, the inspector observed welding in progress on the T-25B fuel oil day tank on October 15, 1980, when no firewatch was present at the scene.

Response to Item 1

The welding in question was being performed by a contractor, and as required by the Plant procedures, was being administratively controlled by a "notice of Outside Construction"(NOC) form. The NOC addressed fire protection requirements and specifically, stipulated that a firewatch was required for welding associated with the fuel oil day tank (T-25B).

The contractor has assigned a welding crew to perform this work, and one man on the crew was the assigned firewatch. Welding had commenced (an arc had been struck) and the welder, not satisfied with the arc, instructed his helper (who was also the firewatch) to make the adjustment to the welding machine, and another arc was struck prior to his return. At this point, the compliance inspector entered the work area and discovered that no firewatch was present.

Corrective Action Taken and Results Achieved

After making adjustments to the welding machine, the firewatch returned to the work scene and resumed his firewatch duties.

Corrective Action to Prevent Recurrence

The Contractor Construction Superintendent reviewed Plant fire protection requirements with his welders. A letter from the Palisades Plant Manager dated November 3, 1980, to the Construction Superintendent confirmed the commitment to adhere to the requirements of Palisades Plant Fire Protection Implementing Procedures.

Date When Full Compliance Will be Achieved

Based on the actions taken above, Consumers Power Company requests that this item of noncompliance be classified as a deficiency. Full compliance is considered to have been achieved.

Item 2

Technical Specification 3.7.2.i provides, in part, that an emergency diesel generator may be inoperable provided there are no inoperable engineered safety feature components associated with the operable diesel generator.

Contrary to the above, at about 2130 hours on October 30, 1980, with charging pump P-55C (associated with emergency diesel 1-1) inoperable, the licensee made emergency diesel 1-2 inoperable for testing.

Response to Item 2

A cylinder leak test (test procedure MO-7A "Emergency Diesels") is required to be performed 48 to 72 hours following load testing of the diesel generator. In this particular instance, charging pump P-55C was made inoperable during the interval between completion of load testing and commencement of cylinder leak testing. The procedure required verification prior to conduct of load testing that there were no inoperable safety feature components associated with the operable diesel generator. Prior to commencement of the cylinder leak tests, however, the procedure MO-7A required determining that the engine could be "temporarily spared from service" without stipulating the criteria for making that determination. Although the individual authorizing the cylinder leak test apparently erred in not reading the initial portions of the procedure, the occurrence could have been avoided by stronger procedural controls associated with the cylinder leak test.

Corrective Action Taken and Results Achieved

Because of its nature, no action to correct the specific occurrence could be taken.

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Corrective Action to Prevent Recurrence

The surveillance procedure governing diesel generator testing has been revised to be more specific in addressing ESF equipment operability prior to cylinder leak testing.

Date When Full Compliance Will be Achieved

The corrective actions described above have been implemented.

Item 3

Technical Specification 3.1.1.3(1) provides a maximum pressure differential limit for the steam generator tubes during transient conditions of 1530 psia.

Contrary to the above, during plant cooldown on October 31, 1980, a steam generator tube differential pressure of 1590 psia was experienced.

Response to Item 3

Corrective Action Taken and Results Achieved

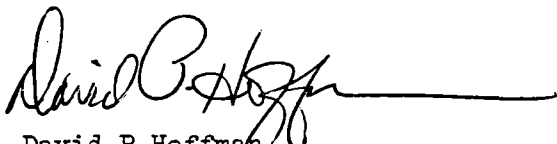
Steam generator secondary side water samples were taken to ascertain that the integrity of the steam generator tubes had not been violated as a result of the excessive differential pressure. In addition, an analysis was performed to verify that the stresses imposed on the steam generator tubes were acceptable. The results of the water samples and mathematical analysis indicated no breach of tube integrity had occurred.

Corrective Action to Prevent Recurrence

The operator who was maintaining the temperature/pressure plot during the cool-down has been counseled regarding his responsibilities. Additional disciplinary action has been taken with shift personnel involved.

Date When Full Compliance Will be Achieved

The corrective actions described above have been implemented.



David P Hoffman
Nuclear Licensing Administrator

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