



**Consumers  
Power  
Company**

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June 15, 1981

Mr James G Keppler  
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 81-06

IE Inspection Report No 50-255/81-06 dated May 20, 1981 detailed two (2) apparent items of non-compliance. Consumers has reviewed the inspection report and is providing the attached responses for the two items.

*Brian D. Johnson*

Brian D Johnson  
Senior Licensing Engineer

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

Att (2 pages)

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ATTACHMENT

CONSUMERS POWER COMPANY  
RESPONSE TO IE INSPECTION REPORT NO 50-255/81-06  
DOCKET 50-255  
LICENSE DPR-20

Item 1

Title 10, Code of Federal Regulations, Part 20.207(a) states:  
"Licensed materials stored in an unrestricted area shall be secured from unauthorized removal from the place of storage."

Contrary to the above, licensed materials in the form of contaminated 55-gallon containers were identified on May 1, 1981, being stored in the on-site overflow parking lot, an unrestricted area, which containers were not secured from unauthorized removal.

This is a Severity Level V violation. (Supplement I.E.)

Response to Item 1

Discussion - Consumers Power Company acknowledges that licensed materials were found in an area not designated for radioactive material storage. This condition indicates inadequacies existed in the program for control of radioactive material within the restricted area. Specifically, the cause of this incident is attributed to the fact that surveys of material consigned to a salvageable equipment storage area, (ie "overflow parking lot") were apparently not adequate to detect residual levels of contamination in containers which had previously been used for radioactive material storage. However, Consumers Power Company does not agree that the material found was in an "unrestricted area". Site layout constraints necessitate movement of radioactive material between several widely dispersed locations, some of which are not in the protected area. Surveys of material transfer routes and nearby areas have been routinely conducted and are considered to be "controls" in the sense of Part 20.3(a)(14), which defines a Restricted Area. Additional company and site procedures incorporate controls on property disposal which provide checks for inadvertent spread of radioactivity. The site security plan includes controls such as posting and routine inspections to ensure unauthorized personnel are not occupying the site.

In light of the above discussion the following steps comprise the corrective action for this incident.

A. Corrective Action Taken and Results Achieved

The three 55-gallon drums which were found to contain radioactive material were promptly removed to an appropriate area for processing as radioactive waste material. Comprehensive survey (approximately 24 man hours) of all the material in the salvage area and vicinity was conducted. One additional drum containing low level radioactive material was found and removed to a radiation controlled area.

B. Action to Prevent Further Noncompliance

1. Health Physics personnel have been appraised of this incident and of the importance of proper surveys of all material leaving radiation controlled areas.
2. Health Physics Procedure 2.14, Routine Radiation and Contamination Surveys, covers checks which are performed in areas not expected to contain radioactive material: the salvage area was not included in this procedure. A new procedure, to be called Routine Site Surveys, is being prepared which substantially expands the areas routinely checked.

C. Date When Full Compliance Will Be Achieved

Full compliance has been achieved with removal of the identified material to controlled areas and the completion of follow-up surveys.

Item 2

Technical Specification 6.8.1(d) states, in part: "written procedures shall be . . . implemented . . . covering the . . . emergency plan implementation".

Contrary to the above, on April 29, 1981, the inspector observed a failure to implement fire protection procedures Part 5.4.2.b in that a Class 1 flammable liquid (methyl alcohol in a glass bottle) was being improperly stored.

This is a Severity Level VI violation. (Supplement I.F.)

Response to Item 2

A. Corrective Action Taken and Results Achieved

The glass container was promptly removed from the area.

B. Corrective Action to Prevent Recurrence

Stockroom personnel have been instructed to issue flammable liquids only in approved containers. Appropriate Supervisors who may be in charge of work activities involving use of flammable liquids have been reminded of their responsibilities with respect to control of flammable liquids.

Date When Full Compliance Will Be Achieved

The actions described above have been implemented.