U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-255/81-20

Docket No. 50-255

License No. DRP-20

Licensee: Consumers Power Company 212 West Michigan Avenue

Jackson, MI 49201

Facility Name: Palisades Nuclear Generating Plant

Inspection At: Palisades Site, Covert, MI

Inspection Conducted:

September 1, 8, 10, 11, 14, 15, 20-26, 30 and

October 1-2, 1981

Inspectors:

10/26/81

Approved By: D. C. Boyd, Chief,

Reactor Projects Section 1A

Inspection Summary

Inspection on September 1, 8, 10, 11, 14, 15, 20-26, 30 and October 1-2, 1981 (Report No. 50-255/81-20)

Areas Inspected: Routine resident inspection program activities including: operations during long-term shutdown; refueling activities; maintenance and modifications; procedures, and followup of an IE Bulletin and previously identified items. The inspection involved a total of 69 inspection hours onsite, including 22 hours on off-shifts.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

- *R. W. Montross, General Manager
- *J. S. Rang, Operations/Maintenance Superintendent
- *H. J. Palmer, Technical Superintendent
- *G. H. R. Petitjean, Technical Engineer
- *R. E. McCaleb, Quality Assurance Administrator
- D. K. Powers, Shift Technical Advisor
- W. S. Skibitsky, Operations Superintendent
- J. A. Meincke, Technical Engineer
- W. L. Burmeister, Shift Technical Advisor
- W. E. Drummond, Reactor Operator
- R. S. Cater, Reactor Operator
- S. Ghidotti, Shift Supervisor (SRO)
- A. S. Kanicki, Shift Supervisor (SRO)
- D. W. Kaupa, Shift Supervisor (SRO)
- G. L. Pothoff, Reactor Operator
- E. I. Thompson, Shift Supervisor (SRO)
- S. F. Pierce, Radioactive Materials Control Supervisor
- B. L. Schaner, Operation Supervisor
- K. M. Farr, Public Affairs Director
- W. E. Adams, Senior Engineer (STA)
- D. P. Spry, Property Protection Advisor

*Denotes those present at Management Interview October 7, 1981.

Numerous other members of the plant Operations/Maintenance, Technical, and Chemistry/Health Physics staff were also contacted briefly.

2. Activities During Long Term Shutdown

The inspector observed selected licensee activities being performed during the current shutdown condition to ascertain compliance to applicable requirements.

a. Control Room

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the month of September 1981. The inspector verified adherence to limiting conditions for operation at cold shutdown, proper shift manning, adherence to selected procedures, and instrument/recorder operations.

b. Facility Tours

Tours of the containment, turbine and auxiliary buildings, the containment building roof, and plant grounds were conducted to: assess general plant/equipment conditions (including standby

equipment); verify that maintenance requests have been initiated for equipment in need of maintenance; examine plant areas (including cabinet interiors) for fire hazards; and verify that ignition sources and flammable material are being controlled in accordance with licensee procedures.

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan. The inspector independently surveyed two radwaste trucks awaiting shipment.

No items of noncompliance or deviations were identified.

3. Refueling Activities

The inspector verified that prior to the handling of fuel in the core, all surveillance testing required by the technical specifications and licensee's procedures had been completed; verified that during the outage the periodic testing of refueling related equipment was performed as required by technical specifications; observed eight shifts of the fuel handling operations (removal and insertion) and verified the activities were performed in accordance with the technical specifications and approved procedures; verified that good housekeeping was maintained on the refueling area; and, verified that staffing during refueling was in accordance with Technical Specifications and approved procedures.

During fuel movement on October 2, the licensee reported that a control rod had been damaged. The licensee is still evaluating the reason/cause of the damaged control rod. This item will be reviewed during a later inspection.

Refueling activities were in process at the time of the report. The remaining fuel activities will be reviewed during a later inspection.

No items of noncompliance or deviations were identified.

4. Maintenance - Refueling

The inspector verified maintenance procedures include administrative approvals for removing and return of systems to service; hold points for inspection/audit and signoff by QA or other licensee personnel; provisions for operational testing following maintenance; provisions for special authorization and fire watch responsibilities for activities involving welding, open flame, and other ignition sources; reviews of material certifications; provisions for assuring LCO requirements were met during repair; provisions for housekeeping during and following maintenance; and responsibilities for reporting defects to management.

The inspector observed the maintenance activities listed below and verified work was accomplished in accordance with approved procedures and by qualified personnel.

- a. Installation of anchors/braces on control room and cable-spreading room cabinets.
- b. Main turbine inspection and overhaul activities.
- c. Removal of station batteries and preparations for replacement.
- d. Miscellaneous fabrication, installation and wiring related to the long-term cooling system.
- e. Electrical and seismic support work on an emergency diesel generator.
- f. Reactor vessel stud cleaning.

No items of noncompliance or deviations were identified.

5. Procedures

Selected licensee procedures were examined during this inspection to determine technical adequacy; consistency to license requirements; and proper development, review, approval, and revision.

- a. General Plant Operating Procedures (GOP's)
 - (1) GOP-6

Power Level Change

(2) GOP-10

Emergency Shutdown from Power

(3) GOP-11

Refueling Operations

b. Systems Operating Procedures (SOP's)

SOP-28

Fuel Handling System

c. Emergency Operating Procedures (EOP's)

EOP-2

Loss of AC Power

d. Other

(1) FHSO-6

Movement of Control Rod CR-133

(2) FHSM-10

Exxon Fuel Receipt Inspection

(3) PCS-M-29

Primary Coolant Pump Uncoupling

(4) MSS-M-17

Testing of Rebuilt Snubbers

(5) Admin 5.3

Periodic Activity Control System

The review of EOP-2 included examination of related staff training to address NRC Generic Letter 81-04. Licensee actions on this matter were deemed satisfactory, and the issue is considered closed.

No items of noncompliance or deviations were identified.

6. IE Bulletin Followup

Some review of IE Bulletin 80-11, "Masonry Wall Design", was conducted during this inspection, with the emphasis on verification that the licensee's evaluations and actions concerning systems jeopardized by masonry walls are consistent with license requirements. The licensee has identified, by conservative screening techniques, walls whose failure might jeopardize safety equipment, typically cable trays, but no determination has been made which walls (or segments) will jeopardize safety equipment. Repairs are proceeding on all suspect walls which are accessible only with the plant in its current shutdown condition. The licensee was informed that the NRC position on this issue is that a documented determination on the actual adequacy of suspect walls must be made before startup, or sufficient repairs to remove the walls from the suspect category must be completed.

This matter will be reviewed further during a future inspection. Further, the Bulletin itself will remain open pending technical review and evaluation of the licensee's analytical methods and results. The matter was discussed at the management interview.

No items of noncompliance or deviations were identified.

7. Followup on Previously Identified Items

- a. (Closed) Noncompliance Item, IE Report No. 050-255/80-08: Signoff of shift and relief turnover checklist. The licensee's actions as described in his letter dated July 23, 1980, have been verified and the efficacy of those actions over the long term verified.
- b. (Closed) Noncompliance Items, IE Report No. 050-255/80-15:
 Actions with inoperable snubbers and reporting requirements for
 inoperable snubbers. As a result of a conference on March 27,
 1981, among the licensee, NRC Region III, and the NRC Office
 of Nuclear Reactor Regulation, the licensee implemented section
 3/4.7.9 of NUREG-0212. Adherence to these specifications has
 been verified.
- c. (Closed) Noncompliance Item #3, IE Report No. 050-255/80-24: Violations of administrative and operating procedures. The licensee's corrective actions described in his letter of July 6, 1981 were verified.

d. (Closed) Open Inspection Item, IE Report No. 050-255/81-05: Shift supervisor notification on maintenance under the Periodic Activity Control System (PACS). The PACS has been revised to clarify notification criteria. The licensee has audited the area under Surveillance QP-81-12 and found the revisions effective in addressing similar concerns developed in his own corrective action system.

e. (Closed) Paragraph A.5, NRC Order dated March 10, 1981: The licensee is installing circuit modifications to alarm abnormal battery conditions during the current outage; a schedule agreed to by NRC Region III.

No items of noncompliance or deviations were identified.

8. Management Interview

A management interview (attended as indicated in Paragraph 1) was conducted following completion of the inspection. The following items were discussed.

- a. The inspectors summarized the scope and findings as described in these Details.
- b. The NRC position on IE Bulletin 80-11 was discussed.