



**Consumers
Power
Company**

David P Hoffman
Nuclear Licensing Administrator

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-1636

January 4, 1982

James G Keppler, Administrator
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 81-23

IE Inspection Report 81-23 dated December 1, 1981 transmitted two apparent items of noncompliance requiring a response. The items, and responses thereto are as follows:

Item

Technical Specification 6.8.1.b requires written procedures be established and implemented covering refueling operations.

Procedure GOP-11, "Refueling Operations" requires, at Step 3.2, completion of checklist G CL 11.2 during each shift of fuel handling.

Contrary to the above, checklist G CL 11.2 was not completed during shifts of fuel handling on September 25-27, 29, 30 and October 1-6, 1981, in that Items 11, 12 and 13 were variously omitted.

Response

Corrective Action Taken and Results Achieved. Because discovery of the omitted checklist items occurred after completion of refueling, action to perform them was not possible. Review of the specific items indicates the omissions occurred as a result of a combination of failure to follow procedures and conflicting requirements. With respect to each checklist item identified above, the following discussion is considered germane:

Checklist item 11 requires a once per shift verification that the equipment hatch and personnel lock configurations are proper. Based on other operations which took place during the refueling period and from review of security records, it is concluded that both the equipment hatch and personnel air lock were in their required configurations.

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Checklist item 12 requires greasing the tilt machine hydraulic pump crank bearing every 24 hours of operations (emphasis added). SOP 28 (System Operating Procedure for Fuel Handling System) states the bearing should be greased every 24 hours running time (emphasis added). Although records of tilt machine running time have not been maintained, experience indicates that an entire refueling operation (1/3 core reload) could be completed with approximately ten to fifteen hours of tilt machine operation. The bearings were greased near the beginning of refueling operation on September 26, 1981; this single greasing is considered to have been sufficient for the ensuing refueling period which terminated on October 6, 1981.

Checklist item 13 requires completion of another checklist each shift during which the fuel elevator is used. In the case of this missing item, there appear to be no mitigating circumstances; although it is noted that SOP 28 contains no requirement for completion of this item.

Corrective action to be taken to prevent further noncompliance. As indicated in the discussion above, some inconsistencies exist between SOP 28 and checklist G CL 11.2. These will be reviewed and revised accordingly. With respect to tilt machine greasing, as well as other checklist items, frequencies for performance will be reviewed and revised to be consistent with other priorities, sound operating practice and regulatory requirements. Training covering requirements of refueling procedures and associated checklists will be provided to operators who perform refueling operations.

Date when full compliance will be achieved. The actions described above will be completed prior to commencement of refueling operations to be conducted during the next refueling outage.

Item

Technical Specification 6.8.1.a requires written procedures be established covering activities listed in Appendix A of Regulatory Guide 1.33 (November 1972) which includes, at G.1.a, liquid radioactive waste collection. Technical Specification 6.8.2 requires review and approval of these procedures by the Plant Review Committee and the plant manager, respectively, prior to implementation.

Contrary to the above, the licensee performed liquid radioactive waste collection from the containment sump on October 3, 1981, via a test connection between the containment isolation valves without benefit of a procedure.

Corrective action taken and results achieved. The procedures governing transfer of radioactive waste (SOP 17 and SOP 18) do not address all valve lineups which **may** be used to transfer either liquid or gaseous waste. Inasmuch it is neither practical nor possible to specify every method to cover all contingencies involving handling of radioactive waste, it is intended to revise SOPs 17 and 18 to permit use of special valve lineups for radioactive waste transfers provided the lineups are specified in writing (eg, on a special valve lineup sheet) and approved by a shift supervisor. Precautions and limitations to ensure that Technical Specification requirements are not violated will be added to both procedures.

JGKepler, Administrator
Palisades Plant
January 4, 1982

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Corrective action to prevent further noncompliance. The corrective actions described above are considered adequate to prevent recurrence.

Date when full compliance will be achieved. The procedure revisions described above will be implemented by March 31, 1982.



David P Hoffman
Nuclear Licensing Administrator

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

CONSUMERS POWER COMPANY

PALISADES PLANT

IE Inspection Report no 50-255/81-23
Response to NRC letter dated December 1, 1981

Docket No 50-255
License No DPR-20

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits our response to NRC letter dated December 1, 1981 which provides IE Inspection Report No 50-255/81-23 and a Notice of Violation dated December 1, 1981. Consumers Power Company's response is dated January 4, 1982.

CONSUMERS POWER COMPANY

BY

R B DeWitt 1/4

R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to me this 4th day of January, 1982.

Helen I. Dempski

Helen I Dempski, Notary Public
Jackson County, Michigan

My commission expires December 14, 1983.