

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
CONSUMERS POWER COMPANY) Docket No. 50-255
)
(Palisades Plant))

ORDER CONFIRMING LICENSEE COMMITMENTS
ON POST-TMI RELATED ISSUES

I.

Consumers Power Company (the licensee) is the holder of Provisional Operating License No. DPR-20 which authorizes the operation of the Palisades Plant (the facility) at steady-state power level not in excess of 2530 megawatts thermal. The facility is a pressurized water reactor (PWR) located at the licensee's site in Covert Township, Van Buren County, Michigan.

II.

Following the accident at Three Mile Island Unit No. 2 (TMI-2) on March 28, 1979, the Nuclear Regulatory Commission (NRC) staff developed a number of proposed requirements to be implemented on operating reactors and on plants under construction. These requirements include Operational Safety, Siting and Design, and Emergency Preparedness and are intended to provide substantial additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification

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of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982¹. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion,
- (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and
- (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

¹The letter sent to Consumers Power Company was lost in the mail and this was not determined until they were questioned about their response on April 30, 1982. The letter was then telecopied to them and they responded 30 days after receipt.

III.

Consumers Power Company responded to the Generic Letter 82-05 by letters dated June 1, July 20, and October 25, 1982; Consumers Power Company responded to the Generic Letter 82-10 by letters dated June 7 and 30, 1982. In these submittals, Consumers Power Company confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are several items in Generic Letter 82-10 that as noted in Attachment 2 have licensee schedules which are yet to be determined. These items are, therefore, not included in this Order. The licensee considers some of the items addressed in this Order to be completed or to require no modifications. These items are so noted in Attachments 1 and 2. The staff's evaluation of the licensee's delays for implementation of the remaining items is provided herein.

II.B.3 Post Accident Sampling

This item will be delayed by the licensee and will be completed by June 1983. Delay in completion was caused by a design deficiency concerning the method by which a sample is drawn to determine the hydrogen content of the primary coolant. In addition, the containment hydrogen sample line will remain isolated until the isolation valve for the containment hydrogen monitor is reinstalled at the next shutdown longer than 15 days. As compensatory

measures, plant procedures for handling and analyzing post-accident samples were developed and implemented using the existing NSSS sampling panel. These will be utilized until the post-accident sampling equipment becomes operational.

II.E.1.2 Auxiliary Feedwater (AFW) Initiation and Flow Indication

This item is completed except for the electro-pneumatic converters for the auto-initiation of the auxiliary feedwater. Converters with safety grade certification were not available at the time this modification was installed but will be installed at the next refueling outage. In the interim, the licensee has installed control grade converters and the system is operational.

II-F.1 (1-6) Post-Accident Monitoring (6 items)

The licensee will delay four items, II.F.1(1), (2), (3), and (6). For Item II.F.1(1), Noble Gas Effluent Radiological Monitor, the present schedule for completion is March 1, 1983. Faulty detectors were delivered with the monitor and the vendor has delayed sending replacement detectors. In the interim, a collimated ion chamber which views the steam released from the atmospheric steam dump and code safety valves provides the capability to monitor radioactive releases from the secondary side steam system. For Item II.F.1(2), Continuous Sampling of Plant Effluents, the present schedule for completion is July 1, 1983. The equipment, as delivered, has some deficiencies including filter leakage which required ordering a new filter package from another vendor. In the interim, the radioactivity of the gas released from the Plant Stack is monitored by a collimated ion chamber which views the stack. For

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Item II.F.1(3), Containment High Range Monitor, the present schedule for completion is June 1, 1983. The only thing lacking to complete this item is a calibration source which the vendor is unable to provide. Consumers Power Company believes this can be resolved by June 1, 1983. In the interim, monitoring high levels of radiation in the Containment Building can be provided by the containment isolation area monitors and by containment atmosphere sampling. For Item II.F.1(6), Containment Hydrogen Monitor, the present schedule for completion is at the first outage of more than a 15 days duration after December 15, 1982. The next scheduled outage is the refueling in September 1983. This delay was caused by leakage of the monitor's isolation valves which required their removal for repair and capping of the sample lines to preserve containment integrity during operation. In the interim, containment air samples can be drawn through the NSSS sampling panel when desired for analysis.

III.D.3.4 Control Room Habitability

The licensee has proposed modifications to the control room ventilation system. These modifications will be completed at the next refueling outage presently scheduled for September 1983.

We find, based on the above evaluation, that: (1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; (2) there is good cause for the delays (unexpected design complexity, interface problems, delivered equipment deficiencies and equipment delays); and (3) as noted above, interim compensatory measures have been provided.

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In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore should be confirmed by order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT the licensee shall:

Implement and maintain the specific items described in the Attachment to this Order in the manner described in the licensee's submittals noted in Section III herein no later later than the dates in the Attachments.

V.

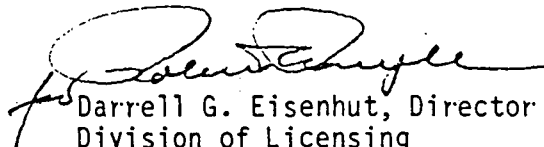
The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether, the licensee should comply with the requirements set forth in Section IV of this Order.

This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14 day of March
1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)*
I.A.3.1	Simulator Exams	10/01/81	Include simulator exams in licensing examinations	Complete
II.B.2	Plant Shielding	01/01/82	Modify facility to provide access to vital areas under accident conditions	Complete
II.B.3	Post-Accident Sampling	01/01/82	Install upgrade post-accident sampling capability	Installed, being tested but isolate. To be operational by 6/1/83 except dependent on H ₂ Monitor II.E.1.G)
II.B.4	Training for Mitigating Core Damage	10/01/81	Complete training program	Complete
II.E.1.2	Aux. Feedwater Initiation & Flow Indication	07/01/81	Modify instrumentation to level of safety grade	Replace converters 9/83*
II.E.4.2	Containment Isolation Dependability	07/01/81	Part 5-lower containment pressure setpoint to level compatible w/normal operation.	Complete
		07/01/81	Part 7-isolate purge & vent valves on radiation signal	Complete
II.F.1	Accident Monitoring	01/01/82	(1) Install noble gas effluent monitors.	Vendor delay Operational by 3/1/83.
		01/01/82	(2) Provide capability for effluent monitoring of iodine	Vendor delay Operational by 7/1/83
		01/01/82	(3) Install incontainment radiation-level monitors	Vendor delay Operational by 6/1/83
		01/01/82	(4) Provide continuous indication of containment pressure	Complete
		01/01/82	(5) Provide continuous indication of containment water level.	Complete
		01/01/82	(6) Provide continuous indication of hydrogen concentration in containment.	Complete except isolated because valve removed for repair. Return to service at next outage greater than 15 days.

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility

PALISADES PLANT

Attachment 2

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)*
I.A.1.3.1	Limit Overtime	10/01/82 per Gen Ltr 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Generic Ltr. No. 82-12, dtd 6/15/82	Complete
I.A.1.3.2	** Minimum Shift Crew	To be superseded by proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units	To be addressed when Final Rule is issued.
I.C.1	** Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
II.D.1.2	RV and SV Test Programs	07/01/82	Submit plant specific reports on relief valve and safety valve program.	Complete
II.D.1.3	Block Valve Test Program	07/01/82	Submit report of results of test program	Complete
II.K.3.30 & 31	** SBLOCA Analysis	1 year after staff approval of model	Submit plant specific analyses	To be determined following staff approval of model.
III.A.1.2	** Staffing Levels for Emergency Situations	Superseded by 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be Determined
III.A.1.2	** Upgrade Emergency Support Facilities	" " "	" " " "	" " "
III.A.2.2	** Meteorological Data	" " "	" " " "	" " "
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study.	9/15/83*

*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

**Not Part of Confirmatory Order.