Consumers Power Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

February 19, 1985

Director,
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - REVISED PLAN AND SCHEDULE FOR COMPLETION OF ACTIONS REQUIRED BY GENERIC LETTER 83-28

Consumers Power Company submittal dated October 10, 1984 requested an extension of time to respond to Generic Letter 83-28. That extension request indicated that a revised schedule would be provided when the manpower necessary to complete the actions required by Generic Letter 83-28 was available.

Work has now been initiated on the remaining open issues of Generic Letter 83-28. Attachment 1 to this letter contains a revised plan and schedule for completion. Also included is a summary reflecting the status of those issues for which responses have been previously submitted, and identification of those issues which are not applicable.

Brian D Johnson
Staff Licensing Engineer

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

8502250410 850219
PDR ADOCK 05000255
P PDR

A055
1/

ATTACHMENT 1

CONSUMERS POWER COMPANY
Palisades Plant
Docket 50-255

GENERIC LETTER 83-28

PROGRAM PLAN AND SCHEDULE
February 19, 1985

3 Pages

1) Issue 1.1 Post Trip Review (Program Description and Procedure)

A program addressing the criteria of Issue 1.1 will be developed and implemented to ensure that unscheduled reactor shutdowns are properly analyzed prior to plant restart. A report describing the program will be submitted by July 1, 1985.

2) Issue 1.2 Post Trip Review (Data and Information Capability)

A review of the plant data and information capability for diagnosing unscheduled reactor shutdowns will be performed. A report describing the plant's data and information capability will be submitted by July 1, 1985.

3) Issue 2.1 Equipment Classification and Vendor Interface (Reactor Trip System Components)

Consumers Power Company's letter dated November 7, 1983 provided our initial response to Issue 2.1. That letter described the Plant's programs for controlling safety related activities, including maintenance and the procurement of replacement parts. In addition, that letter described our initial position in regard to the Vendor Interface portion of Issue 2.1. Consumers Power Company's letter dated May 31, 1984, described our plan and schedule for implementing a vendor information control program and our commitment to implement the enhancements to the Nuclear Plant Reliability Data System (NPRDS), recommended by the Institute of Nuclear Power Operations (INPO).

To complete the actions required by Issue 2.1, Consumers Power Company will conduct a review of the reactor trip system components to verify that each component is specifically identified as being safety related. A statement confirming the completion of this activity will be submitted by May 1, 1985.

Additionally, a report describing: 1) the program for controlling vendor supplied information, and 2) the schedule for implementation of the enhanced NPRDS program, will be submitted by May 15, 1985.

4) Issue 2.2 Equipment Classification and Vendor Interface (Programs For All Safety-Related Components)

Consumers Power Company's response dated November 7, 1983 provided a description of the programs in place at Palisades to ensure that safety related structures, systems and components are appropriately identified and maintained. This description addressed the Equipment Classification issue in its entirety; consequently, no further response regarding equipment classification is necessary.

The forthcoming response to the Vendor Interface issue, described in Issued 2.1 above, will also apply to Issue 2.2. Therefore, a separate response to the Vendor Interface portion of Issue 2.2 will not be submitted.

5) Issue 3.1 Post-Maintenance Testing (Reactor Trip System Components)

A review will be conducted to verify that adequate post maintenance testing is performed on all reactor trip system components, demonstrating that the equipment is capable of performing its safety function. Vendor and engineering information will also be reviewed to verify that appropriate test guidance is included in test procedures. A statement confirming the completion of these activities will be submitted by June 1, 1985.

6) Issue 3.2 Post-Maintenance Testing (All Other Safety Related Components)

Palisades Plant Administrative Procedures will be revised to specifically require post maintenance operability testing of safety related equipment following any maintenance activity which has the potential to affect equipment operability. A statement confirming the completion of this activity will be submitted by May 1, 1985.

Test and maintenance procedures are currently reviewed at least every two years to ensure that appropriate content is maintained. This review process will be upgraded to specifically require a review of applicable vendor and engineering recommendations for inclusion in the procedures as appropriate. A statement confirming the completion of this activity will be submitted by May 1, 1985. Actual verification that appropriate vendor recommendations are included in test and maintenance procedures will be accomplished as part of the on-going biennial procedure review process.

7) Issue 4.1 Reactor Trip System Reliability (Vendor Related Modifications)

A review of vendor information for reactor trip system components will be conducted to verify that any/all vendor recommended modifications have been implemented. A statement confirming the completion of this activity will be submitted by June 1, 1985.

8) Issue 4.2 Reactor Trip System Reliability (Preventive Maintenance and Surveillance Program For Reactor Trip Breakers)

Responses addressing Issue 4.2 were submitted on November 7, 1983, February 3, 1984 and January 28, 1985. These responses described the reactor trip system at the Palisades Plant, and indicated that reactor trip breakers are not used to automatically trip the reactor. Rather than breakers, contactors are used to provide the trip function. The manual trip system, which does include breakers, was also described. Preventive maintenance recommendations from the contactor and breaker vendors were described, as well as the in-place programs for preventive maintenance. Life cycle testing and periodic replacement of reactor trip system components was determined to be unnecessary. No further actions to address Issue 4.2 are planned.

9) Issue 4.3 Reactor Trip System Reliability (Actuation of Shunt Trip Attachment For Westinghouse and B&W Plants)

Palisades is a Combustion Engineering plant and does not utilize breakers with shunt trip attachments. Consequently, Issue 4.3 is not applicable to Palisades, and no further response is necessary.

10) Issue 4.4 Reactor Trip System Reliability (Improvements In Maintenance and Test Procedures For B&W Plants)

Issue 4.4 is applicable only to B&W licensees; consequently, no response is necessary.

11) Issue 4.5 Reactor Trip System Reliability (System Functional Testing)

On-line functional testing of the reactor trip system is currently performed at Palisades. A report describing the program for on-line testing of the reactor trip system will be submitted by July 1, 1985.