

**Consumers
Power
Company**

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

July 26, 1985

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 83-28;
ISSUES 2.1, 2.2 (VENDOR INTERFACE), 3.1 (POST MAINTENANCE
TESTING), 3.1.3 AND 3.2.3 (TECHNICAL SPECIFICATIONS)

Consumers Power Company letters dated November 7, 1983, May 31, 1984, February 19, 1985 and May 15, 1985 provided information which addressed the Vendor Interface position of Issues 2.1 and 2.2. A summation of that information is provided to clarify its major elements. Additionally, Consumers Power Company letter dated June 3, 1985 indicated that within 60 days, Issue 3.1 would be addressed with respect to the bistable and auxiliary trip units, and Issues 3.1.3 and 3.2.3 would be addressed regarding post-maintenance testing requirements in the Palisades Technical Specifications. The responses are provided herein.

Issues 2.1 and 2.2 (Vendor Interface)

In addressing the Vendor Interface position of Issues 2.1 and 2.2, Consumers Power Company utilized the recommendations of the INPO sponsored NUTAC as guidance, in developing a program to meet the intent of Generic Letter 83-28. The resulting program consists of three major elements: 1) a program for reviewing operating experience information, 2) participation in INPO's Nuclear Plant Reliability Data System (NPRDS), and 3) a program to control the vendor information files.

Consumers Power Company letter dated May 31, 1984 contained a description of the existing program for reviewing operating experience information received from industry sources. Information received from the INPO SEE-IN program (SOER's, SER's), the NSSS Vendor (CE ADP Info bulletins), the NRC (IE Notices) and occasionally from the equipment vendors themselves (generic problems) is reviewed and evaluated through a single operating experience review program. The program is administered by the plant's Independent Safety Engineering Group (ISEG), with recommendations resulting from the review of applicable items being forwarded to the appropriate plant department(s) for action as

OC0785-0249-NL04

8507300331 850726
PDR ADDCK 05000255
PDR

A055
/10

Director, Nuclear Reactor Regulation
Palisades Plant
Generic Letter 83-28, Issues 2.1, 2.2, 3.1, 3.1.3 & 3.2.3
July 26, 1985

2

necessary. This program provides a consistent means of addressing generic problems resulting from operating experience, regardless of the source.

Consumers Power Company letter dated May 15, 1985 provided the implementation schedule for the NPRDS program, addressing development of the data base and reporting of equipment failures.

The May 15, 1985 letter also discussed the implementation of a program for ensuring that vendor information files are complete, current and controlled. A new Administrative Procedure was developed to define the requirements of this program. The review and approval of vendor information, as detailed in the procedure, pertains only to newly received information and revisions. The procedure utilizes the current status of the existing vendor information files as a baseline, and controls new/revised information from that point. To help establish the status of the existing information files, a page check will be conducted between the on-site files (Document Control Center) and the duplicate off-site files (Engineering Records Center). The page check effort is scheduled to take approximately a year to complete. Resolution of discrepancies arising from the page check will establish the quantitative content of the existing files, but will not address the qualitative status. The qualitative status of the existing files will be indirectly addressed as reviews associated with the receipt of new/revised information are completed.

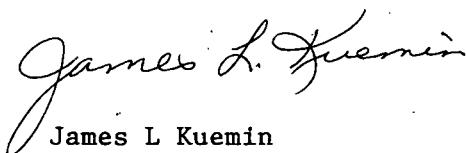
Taken together, the three separate elements which constitute the overall program provide a level of control commensurate with the intent of the Vendor Interface position stated in Generic Letter 83-28.

Issue 3.1 (Post-Maintenance Testing-Bistable & Auxiliary Trip Units)

The vendor's review to confirm the adequacy of post-maintenance testing for the bistable trip units and auxiliary trip units has now been completed. The review indicates that the present method of post-maintenance testing which is performed for these components adequately demonstrates that the equipment is capable of performing its safety function.

Issues 3.1.3 and 3.2.3 (Post-Maintenance Testing - Technical Specifications)

The Palisades Technical Specifications do not contain specific post-maintenance testing requirements. Consequently, these issues are not applicable.



James L. Kuemin
Staff Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades