DmB

SEP 14 1987

Docket No. 50-255

Consumers Power Company
ATTN: Dr. F. W. Buckman
Vice President
Nuclear Operations
212 West Michigan Avenue
Jackson, MI 49201

Gentlemen:

By letter dated June 1, 1987 Region III transmitted to you NRC Inspection Report 50-255/87-035. This report documented the results of a Special Plant Readiness Inspection and included five Notices of Violation for which responses were required.

By letter dated July 16, 1987 Consumers Power Company responded to the Notices of Violation. Region III reviewed your response and found it lacking for three of the violations as follows:

Item 1: Violation 255/86035-149

This violation documents a failure to conduct a required review of a safety related plant modification in sufficient depth to ensure that necessary post modification test requirements were identified. Specifically, the modification package, FC-718, identified five automatic functions required to occur upon receipt of a Recirculation Actuation Signal (RAS). Our inspection determined that two of these functions, automatic closure of the Safety Injection Refueling Water (SIRW) Tank recirculation valves and automatic start of a second Component Cooling Water (CCW) Pump, were not addressed in the specified post modification testing requirements. Upon closer scrutiny it was determined that these functions do not exist at Palisades although clear reference is made to the CCW pump autostart feature in an FSAR logic diagram. Interviews with members of your staff knowledgeable in the details of the modification disclosed that they were unaware that the modification package ascribed these functions to RAS and were unsure as to whether either function did or did not, in fact, exist. Ultimately, it was determined that the post-modification testing actually performed was adequate to demonstrate that the modification performed its intended function without any adverse impact on the RAS or related circuitry; however, this was fortuitous in that the testing required was based on an assumed RAS circuit configuration rather than that identified by detailed review of the modification package.

Your corrective action for this violation consists of essentially two parts. The first part involves updating the FSAR to remove the reference to the CCW pump automatic start feature. The second part involves reminding engineering



1/0
IE01

personnel that the design review is a critical review of those documents identified in the detailed design to provide assurance that they are correct and satisfactory. While these actions are appropriate, they do not address two significant factors contributing for this violation. First the design input check list for FC-718 failed to reference the logic diagram identifying the CCW pump automatic start feature. Second, the modification package reviewers, both in engineering and Quality Assurance, failed to compare the specified post-maintenance testing to the system functional requirements clearly identified in the modification package.

As part of your overall response to this violation you requested that based on it being an isolated event and the fact that the testing actually performed was adequate that Region III reconsider whether it should be categorized as a Severity Level IV violation. We have reviewed this matter and conclude that the Severity Level IV categorization is appropriate. We base this conclusion on the importance of ascribed to conducting quality reviews and the lack of substantiating information that this was an isolated event.

Item 4: Violation 255/86035-161

This violation documents a failure to classify modified breaker load shedding schemes as Class 1E and establish the associated quality controls on the modified configurations. Your corrective action for this violation consisted of steps necessary to reestablish the appropriate quality in the modified installations and a commitment to enhance the procedures controlling minor modifications based on findings generated by a Quality Assurance audit of the modification process. While these actions are appropriate, they do not address the potential that this same problem, failure to change quality classification, may have occurred with other modifications. This is particularly important in light of the enhancements deemed necessary to the modification program based on your own audit.

Item 5: Violation 255/86035-162

This violation documents a failure to ensure that instructions to operators on plaques and other operator aids remained consistent with controlled plant procedures including Emergency Operating Procedures. Your corrective action for this violation was to reestablish consistency between control room plaques and operator aids and controlled plant procedures. While appropriate, this action fails to address the root cause of the violation. Further, no assurances are provided that future procedure changes will not result in reappearance of inconsistencies.

Based on the information above, you are requested within 30 days of receipt of this letter to provide additional information regarding root cause, potential

scope of the problem and basis (e.g. if isolated, why), and corrective actions which address root cause and scope for violations 255/86035-149, 161, and 162.

The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning these matters.

Sincerely,

ORIGINAL SIGNED BY E. G. GREENMAN

Charles E. Norelius, Director
Division of Reactor Projects

cc: Mr. Kenneth W. Berry, Director
Nuclear Licensing
David P. Hoffman, General Manager
DCS/RSB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Ronald Callen, Michigan
Public Service Commission
Michigan Department of
Public Health
T. Wambach, LPM, NRR

RIII
Guldemond/cs
9/2/87

RIII
Norelius
9/10/87