



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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Director
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October 19, 1987

Nuclear Regulatory Commission
Document Control Desk
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
RESPONSE TO INSPECTION REPORT 86035 - ADDITIONAL INFORMATION

NRC letter dated September 14, 1987 requested Consumers Power Company to provide additional information regarding root cause, potential scope of the problem and corrective actions which address root cause and scope for violations 255/86035-149, 161 and 162. These violations were initially addressed in Consumers Power Company letter dated July 16, 1987. Each NRC item requiring additional information is listed in the attached pages followed by Consumers Power Company's response.

Kenneth W Berry

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Director, Nuclear Licensing

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

Attachment

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ATTACHMENT

Consumers Power Company
Palisades Plant
Docket 50-255

RESPONSE TO INSPECTION REPORT 86035 - ADDITIONAL INFORMATION

October 19, 1987

3 Pages

OC1087-0188-NL04

RESPONSE TO INSPECTION REPORT 86035 - ADDITIONAL INFORMATION

Item 1: Violation 255/86035-149

NRC letter dated September 14, 1987 stated the following:

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 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.

Response:

Consumers Power Company believes this occurrence to be an isolated case where operation of the plant was not properly described on a Facility Change package and where 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. Two things (testing and Facility Change package review) have been completed in support of this statement. First, Consumers Power Company has recently completed a System Functional Evaluation (SFE) Testing Program which implicitly incorporates all completed modifications on the plant and has verified that the plant is operating as expected. Second, we performed an independent review of all engineering packages performed by a specific contractor and found no additional problems analogous to the concerns expressed in the violation. This review was initiated as a result of Licensee Event Report 87-001 and we are convinced that our internal audits and corrective actions are functioning properly.

In addition to the engineering reviews previously mentioned, Consumers Power Company is committing to perform an additional review by December 31, 1987 of Facility Change packages to provide additional support of our statement that the occurrence was an isolated case. This review will consist of a selection of four recently completed Facility Change packages; two mechanical and two electrical which have different engineers and reviewers, thereby

reviewing the work of eight different people but will also focus on the engineer and reviewer involved with the original incident which led to the violation.

As part of the long term corrective action, we will complete an upgrade to our Administrative Procedures by December 1, 1987. This upgrade will specifically define the responsibility of the engineer handling a modification to define and set a boundary around what specifically is being tested, and then test only that equipment.

Item 4: Violation 255/86035-161

NRC letter dated September 14, 1987 stated the following:

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.

Response:

In order to address the potential that this problem, failure to change quality classification, may have occurred with other modifications, Consumers Power Company is conducting a surveillance involving a representative sample specifically directed at Q Modification Facility Changes and Non-Q Modification Facility changes which may have an impact on Q systems. This surveillance will be completed by December 31, 1987. Any deficiencies found from this audit will be handled through our Corrective Action System. Expansion of the representative sample will occur, if warranted, during normal processing of a deficiency in our Corrective Action System.

Item 5: Violation 255/86035-162

NRC letter dated September 14, 1987 stated the following:

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.

Response:

The root cause for this violation was a lack of administrative controls on informational placards mounted on control room panels. Administrative controls currently exist for Emergency Operating Procedure (EOP) changes. These controls require a control room walkthrough of the new or revised EOP. These administrative controls will be enhanced to include informational placards and operator aids in the control room and will be made applicable to changes to other Operations Department procedures. In addition, control room information placards will be incorporated into the Palisades Operator Aid Program. This program presently covers the posting, auditing and removal of posted paper in the control room. The addition of the control room informational placards will better control the initial posting and verify the accuracy of all control room informational placards periodically. These additional administrative controls will be completed by December 31, 1987 and will provide assurance that future procedure changes will result in consistent control room information placards.