



CONSUMERS
POWER

**POWERING
MICHIGAN'S PROGRESS**

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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
RESPONSE TO INSPECTION REPORT 87-029

NRC Inspection Report 87-029 dated December 17, 1987 transmitted one Notice of Violation and requested a written response. The violation involves the failure to comply with a written procedure governing the performance of containment isolation valve position checks. Consumers Power Company's response to this violation is as follows:

Response:

Violation (255/87029-01) (DPR)

As a result of the inspection conducted on November 3 through December 1, 1987 and in accordance with the General Policy and Procedures for NRC Enforcement Actions (10CFR Part 2, Appendix C), the following violation was identified:

Technical Specification 6.8.1 requires the implementation of certain procedures including those governing the operation of the Plant systems. Included in the procedures governing operation of the Plant systems is Administrative Procedure 4.02 which requires that when a valve ". . . position is found to be different from that specified, the Shift Supervisor shall be notified and he shall authorize the positioning of the valve."

Contrary to the above, on November 16, 1987 valve WGS-511 was found in a position (locked closed) contrary to Procedure MO-29 requirements (Open); seven of the nine previous valve position checks performed during 1986 and 1987 failed to identify and document the position discrepancy and failed to report same to the Shift Supervisor.

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Corrective Actions Taken And Results Achieved

On November 16, 1987, Plant Auxiliary Operator performing Technical Specification Surveillance Procedure MO-29, "Engineered Safety System Alignment", identified a discrepancy/typographical error regarding the positioning of containment ventilation header test valve, MV-WGS511. The valve was found to be in its required locked closed position, however, MO-29 specifies that the valve should be verified to be in the open position. This procedural discrepancy had also been identified during the second performance of MO-29 in 1986. However, due to the Plant Review Committee (PRC) rejection of a temporary change to the procedure and mis-communication between Plant personnel, the procedure was not corrected. This procedure has been performed nine times since the error was identified in 1986.

As stated in the inspection report, Consumers Power and the NRC Senior Resident Inspector believe that, the one inch test line valve which was found locked closed and capped was being verified as locked closed and the checklist was being initialed erroneously.

On November 18, 1987, a technical review of procedure MO-29 was completed. This review entailed verifying all other valve positions indicated within the procedure were correct and then physically verifying that actual in-plant valve positions corresponded to their required positions. No additional errors were found in the procedure or with valve positions. The Plant Operations Superintendent then reviewed the event with all on-shift Operations personnel.

On December 1, 1987, personnel involved with the communication error which resulted in the failure to correct the procedural discrepancy were counselled with respect to the need to properly documenting the closure of open PRC items. Temporary changes to procedures that are disapproved by the PRC will be forwarded to the originator and the affected department supervisor to assure the procedural error is otherwise corrected in a timely manner.

Corrective Actions To Be Taken To Avoid Further Noncompliance

Operations Department checklists are being revised to ensure the following exists:

- Standardized formatting
- All required valve positions are fully printed out, no abbreviations
- Valves in potentially contaminated areas are arranged by rooms, with no two areas on the same sheet
- A comment section is present on each sheet

In addition, the above revisions are also being performed for all surveillance procedures containing valve checklists.

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An evaluation is being conducted, to determine the best way to assure that no discrepancies exist before procedure issuance.

Auxiliary Operators will be to be required to utilize original checklists or procedures during their performance. Guidance has been provided to the Operations Department by the Radiological Services Department to provide expeditious copying of contaminated original checklists or procedures.

Date When Full Compliance Will Be Achieved

All corrective actions described above, with the exception of Surveillance Procedure revisions, will be completed by June 1, 1988. Completion of the Surveillance Procedure revisions will occur by December 31, 1988 due to the extensive number of Technical Specifications procedure revisions to be done.

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