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Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

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January 7, 1991

Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Docket 50-255 - License DPR-20 - Palisades Plant  
RESPONSE TO INSPECTION REPORT 90034; NOTICE OF VIOLATION

Nuclear Regulatory Commission (NRC) Inspection Report 90034, dated November 28, 1990 and supplemented on December 7, 1990 documented the results of a routine safety inspection and resulted in the issuance of two violations for: (1) having insufficient personnel for the initial or continuous staffing of certain positions in the emergency response organization and (2) maintaining a person on the augmentation list who was to respond to an emergency within 30 minutes and who was untrained in dose assessment. The following is Consumers Power Company's response to these violations.

Due to questions arising from the inspection report and its supplement, Consumers Power Company requested and received acceptance from Mr. Bruce Jorgensen, NRC Region III, of an extension in the response date to January 7, 1990.

Violation 50-255/90034-02

10 CFR 50.47(b)(1) states in part, "each principal response organization has staff to respond and to augment its initial response on a continuous basis." 10 CFR 50.47(b)(15) states, "Radiological emergency response training is provided to those who may be called to assist in an emergency." Palisades Technical Specifications, Chapter 6.8.1, requires implementation of the Site Emergency Implementation Procedures.

Four specific portions of the site emergency plan and procedures all clearly indicate the requirement to staff the positions in question on a continuous basis. Those references are: the Palisades Nuclear Plant Site Emergency Plan, Section 5, Revision 9, Figure 5-6; EI 4.3, Attachment 4, Revision 6; Emergency Employee Listing by Group dated 10/10/90; and the Emergency Employee Augmentation Listing, dated 10/10/90.

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Contrary to the above, during November 1990, there were only four trained/qualified TSC Communicators. Therefore, there would have been insufficient personnel for the continuous staffing of two TSC Communicator positions. Also, during October 1990, there were no qualified EOF Reactor Engineering Operations Team Members. Therefore, there would have been insufficient personnel for the initial or continuous staffing of the EOF Reactor Engineering Operations Team.

#### Reason For Violation

Personnel on the augmentation list failed to maintain their Emergency Plan Training current. Individual supervisors were aware of the training status of their personnel, however, a mechanism was not in place for all department managers to be notified of this situation.

#### Corrective Actions Taken and Results Achieved

Based on a review of training records it was determined that during November 1990 thirty-four auxiliary operators were trained as communicators as well as nine Technical Support Center (TSC) communicators and three Emergency Operations Facility (EOF) communicators.

In the matter of EOF Reactor Engineering Operations personnel, there are currently two individuals trained. Emergency Plan Procedures EOF 5 and EOF 6 clearly indicate that the EOF Director may combine certain engineering functions thus supplementing the staff without requiring augmentation.

It is believed that in these aforementioned areas adequate personnel would have been available to staff the organization both initially and continuously.

It was also determined in a subsequent review of training records that an insufficient number of personnel were trained for the position of Instrument & Control (I&C) Supervisor for the Maintenance Support Center (MSC). As of December 28, 1990 two I&C supervisors have been trained for this position fulfilling the staffing requirement.

#### Corrective Actions Taken to Avoid Future Non-Compliance

Department Managers are now notified on a monthly basis of the training status of their emergency response organization personnel. Emergency Implementation Procedure EI 15.1 is being revised to formalize the requirement for this monthly notification.

#### Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

#### Violation 50-255/90034-03

10 CFR 50.54(q) requires that a licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements of Appendix E to Part 50. The Site Emergency Plan, Section 5, Figure 5-6 states that the license will have a Senior HP expert respond to an emergency in 30 minutes

with the major task of performing dose assessment. 10 CFR 50.47(b)(15) states, "Radiological emergency response training is provided to those who may be called on to assist in an emergency."

Contrary to the above, the license maintained a person untrained in dose assessment on the augmentation list to respond within 30 minutes from February to November 1990.

#### Reason for Violation

The HP support group leader is the person assigned the task of dose assessment in the Site Emergency Plan, Section 5, Figure 5-6 and is the only person required to respond in 30 minutes to perform dose assessments. At the time of the inspection the augmentation list contained three individuals identified as qualified for the position of HP support group leader. Due to an administrative error, the requirement for dose assessment training for the HP support group leader was inadvertently deleted. As a result, one of the three individuals on the augmentation list for HP support group leader was not trained in dose assessment. Based upon our further review, it was determined that the unqualified individual had been added to the augmentation list less than a week before the inspection team noted the discrepancy. Therefore, the condition did not exist from February to November 1990 as indicated in the inspection report.

#### Corrective Actions Taken and Results Achieved

1. The unqualified person has been removed from the augmentation list.
2. The Training Matrix (EI 15.1) has been revised to require that the HP support group leader be trained in dose assessment.
3. The emergency employee augmentation list has been modified to increase the number of trained personnel available within thirty minutes to perform dose assessment. Personnel trained in dose assessment previously listed under the category of HP support group leader or HP technical support are now listed as TSC HP dose assessors and will be required to respond in thirty minutes to perform dose assessments.

#### Corrective Actions Taken to Avoid Future Non-Compliance

The corrective actions listed above are considered sufficient to avoid future non-compliance in this area.

#### Date When Full Compliance Will Be Achieved

Full compliance has been achieved.



Gerald B Slade  
General Manager

CC Administrator Region III, USNRC  
NRC Resident Inspector, Palisades