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

G B Slade
General Manager

December 13, 1991

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
LICENSEE EVENT REPORT 91-020 - INADEQUATE DOCUMENTATION - ENVIRONMENTAL
PROTECTION PLAN

Licensee Event Report (LER) 91-020 is attached. This event is reportable to
the NRC per Section 2.F of the Palisades Operating License.

Gerald B Slade
General Manager

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

Attachment

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Palisades Nuclear Plant	DOCKET NUMBER (2) 0 5 0 0 0 2 5 5	PAGE (3) 1 OF 0 3
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TITLE (4)
INADEQUATE DOCUMENTATION - ENVIRONMENTAL PROTECTION PLAN

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)									
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)							
1	1	1	9	1	0	2	0	0	1	2	1	3	N/A	0	5	0	0	0
1	1	1	9	1	0	2	0	0	1	2	1	3	N/A	0	5	0	0	0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

OPERATING MODE (9) N	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 110 0	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	X OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Richard W Smedley, Staff Licensing Engineer	TELEPHONE NUMBER
	AREA CODE: 6 1 6 7 6 4 - 8 9 1 3

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	XX				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On November 12, 1991, the NRC resident inspector notified the Palisades Licensing Department that during a routine inspection he reviewed an example of our evaluation of an Unreviewed Environmental Question (UEQ). At the time the plant was operating at 100% power. He found no documentation that an unreviewed environmental question evaluation had been performed in the manner required by Appendix B, the Environmental Protection Plan (EPP), of the Palisades Operating License. Further investigation by Palisades staff determined that no UEQ evaluation had been performed or documented as required by the Environmental Protection Plan (EPP) since February 1987 when the administrative procedure covering this process was revised (i.e. there was not proper documentation to support the conclusions than no UEQs existed). The processing of Environmental Impact Reviews was immediately suspended and the condition reported to the NRC within 24 hours per the requirements of the operating license. Failure to follow the evaluation and documentation requirements of the EPP was due to the deletion, during the revision of Administrative Procedure 4.22 in February 1987, of a form which asked specific questions required by the EPP for evaluating UEQs.

Administrative Procedure 4.22 is being revised to require an UEQ evaluation to be performed in the manner required by the EPP. Additionally, all events occurring since February 1987 which required an Environmental Impact Review are being again reviewed to determine the necessity of performing and documenting an unreviewed environmental question evaluation in the manner prescribed by the EPP.

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

DESCRIPTION OF THE EVENT

In November 1991, during a routine inspection of the Palisades Chemistry Department, the NRC resident inspector asked to see the records of Unresolved Environmental Question (UEQ) evaluations. The Environmental Protection Plan (EPP), Appendix B to the Palisades operating license, describes the method required to evaluate the involvement of an UEQ and the records which should be retained. The inspector was shown a recent Environmental Impact Review regarding the use of "Clamtrol," a chemical additive used to control the growth of Zebra Mussels, which stated there was no UEQ involved but no documentation was available which provided the basis for that determination. The resident inspector reported the situation to the Palisades staff who determined UEQ evaluations had not been properly documented since February 1987.

In February 1987, Administrative Procedure 4.22, "Nonradiological Environmental Program," used to evaluate and document the existence of an UEQ, was revised and the form which insured documentation of an UEQ evaluation in compliance with the Environmental Protection Plan (EPP) was deleted. This resulted in the plant relying on the corporate environmental department to determine if an UEQ is involved in any test, change, procedure or modification which could possibly involve the environment. The corporate environmental department is responsible for environmental compliance with federal, state and local environmental regulations. However, the corporate environmental department is not trained or knowledgeable in nuclear regulatory compliance.

This event is being reported to the NRC in compliance with Section 2.F of the Palisades Operating License.

ANALYSIS OF EVENT

The corporate environmental department and the Michigan Department of Natural Resources had approved the addition of Clamtrol and the corporate environmental department had determined no UEQ existed. The fact that there was no actual environmental impact and no UEQ had been correctly determined and subsequently has been correctly documented. Therefore, no change to the use of Clamtrol was necessary. However, the incident did point out an existing regulatory compliance inadequacy in that the documentation to support the UEQ determination did not meet the requirements of the EPP.

CAUSE OF THE EVENT

This event was caused by a procedural inadequacy. The event did not involve the failure of any equipment important to safety.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT (If more space is required, use additional NRC Form 388A's) (17)

CORRECTIVE ACTIONS

To minimize the possibility of UEQs not being evaluated and documented according the requirements of the EPP and to assure that no UEQs existed during the (February 1987 through December 1991) time period when Administrative Procedure 4.22 did not contain sufficient detail to ensure proper UEQ evaluation and documentation, the following has been or will be completed.

- a. The use of Clamtrol as an additive to the service water system has been properly evaluated and documented as to the existence of an UEQ (No UEQ was involved).
- b. Processing of Environmental Impact Reviews has been suspended until Administrative Procedure 4.22 is revised to include steps which ensure the environmental requirements of the EPP are met for determining the involvement of an UEQ.
- c. Before July 1, 1992, all evaluations of the involvement of UEQs performed since February 1987 will be reviewed. Required evaluations in compliance with the EPP will be performed as necessary.