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Nuclear Regulatory Commission  
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - RESPONSE TO GENERIC LETTER 88-17, "LOSS OF DECAY HEAT REMOVAL" - CHANGE IN COMMITMENT

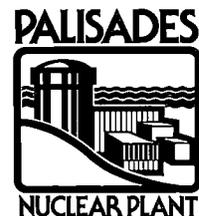
This letter is to inform the NRC of Consumers Power Company's intention to change two commitments previously conveyed to the NRC regarding the frequency of operator training on the subjects of reduced inventory operations and emergency equipment hatch closure. The commitments were previously conveyed to the NRC in CPCo's response to Generic Letter 88-17, "Loss of Decay Heat Removal," dated January 3, 1989.

On October 17, 1988 the NRC issued Generic Letter 88-17, "Loss of Decay Heat Removal," following a number of industry events involving the loss of decay heat removal capability and an apparent lack of complete understanding by the industry as to the potential seriousness of such events. Licensees were requested to provide responses to the eight recommended expeditious actions identified in the Generic Letter.

In our January 3, 1989 response to recommended expeditious action (1) pertaining to reduced inventory operation we stated that "...our training curriculum committee, utilizing an INPO accredited process for determining the frequency of operator training, has determined that this training needs to be provided on an annual frequency to maintain operator proficiency with the material. Therefore, we will ensure that all operators have been trained in accordance with this frequency prior to their assumption of shift duties at the onset of reduced inventory operation. For periods of reduced inventory operation which occur toward the latter half of the annual training frequency, we intend to provide the condensed format for operator self study, as a means of supplementing the formal annual training."

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We have reviewed this commitment and have determined that a change in this commitment is appropriate. We have decided that training on reduced inventory operation should be scheduled to occur shortly before each refueling outage. Furthermore, for forced outages requiring reduced inventory operations which occur greater than six months following a refueling outage, the condensed format training should be provided to the operators prior to the assumption of shift duties at the onset of reduced inventory operations. The change to a refueling frequency versus an annual frequency will ensure that re-training has been provided in a more timely fashion to better coincide with refueling outage operations.

In addition, our January 3, 1989 response to recommended expeditious action (2) pertaining to the implementation of procedures and administrative controls regarding containment closure prior to the time at which a core uncover [sic] could result from a loss of DHR stated that "...our operators will be trained in this task so that they, in addition to our mechanical maintenance personnel, may be relied upon for timely equipment hatch closure. Presently, we have employed procedural controls which will ensure that sufficient personnel are available to complete this task at all times while operating at reduced inventory conditions."

We have reviewed this commitment also and have determined that a change is appropriate. We have decided that training on equipment hatch closure should be scheduled to occur shortly before each refueling outage. Furthermore, for forced outages requiring reduced inventory operations which occur greater than six months following a refueling outage, the auxiliary operators should receive re-training on emergency equipment hatch closure prior to the assumption of shift duties at the onset of reduced inventory operations. This change more clearly identifies the frequency for equipment hatch closure training than did our previous commitment.

  
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