

September 3, 1993

Docket No. 50-255

Consumers Power Company
ATTN: Mr. Gerald B. Slade
General Manager
Palisades Nuclear Generating Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

Dear Mr. Slade:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 50-255/93013(DRS))

This refers to the inspection conducted by Messrs. G. M. Nejfelt, K. Salehi, R. A. Langstaff, R. M. Lerch, and Ms. M. Khanna between June 14 - 19 and between July 26 - 30, 1993. The inspection included a review of activities at your Palisades Plant authorized by NRC Operating License No. DPR-20. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observation of activities in progress. The purpose of the inspection was to determine whether activities authorized by the licensee were conducted safely and in accordance with NRC requirements.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice). The violation is of concern because regulatory requirements for peer inspections were not properly implemented to provide independent verification. Regulatory inspection requirements are found in 10 CFR Part 50, Appendix B, Criterion X, and in your quality program CPC-2A. To implement these regulations, you have committed to Regulatory Guides 1.116 and 1.33. These Regulatory Guides applied various inspection requirements in ANSI N45.2.8, such as, independent verification for equipment leveling and alignment. However, the inspection of the alignment for the turbine driven auxiliary feedwater pump was accomplished by using a "double verification" instead of an independent verification. Based on discussions with your staff, double verifications were typical of inspections used to oversee maintenance activities, and were not intended to meet regulatory requirements. We are concerned that your approach in this area does not meet requirements and may have resulted in an inadequate inspection of many safety-related maintenance activities.

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Although not the central focus of this inspection, the scope of inspections performed outside of the area of maintenance was evaluated. We are concerned that other areas, such as operations and procurement, are not receiving inspections commensurate with significance of each activity. We understand that you are evaluating this concern. We will continue to closely follow your progress in this area during subsequent inspections.

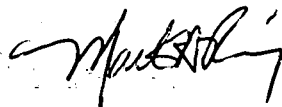
You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. It is also requested that you respond to address the implications of the design control weakness for the inadvertent start of the emergency diesel generator. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your responses to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,



Mark A. Ring, Chief
Operations Branch

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report
No. 50-255/93013(DRS)

See Attached Distribution

RIII	RIII	RIII	RIII
-----SEE FOLLOWING PAGE-----			
Nejfelt/gn/cg/jk 08/26/93	Langstaff 08/ /93	Lerch 08/ /93	SaTehi 08/ /93
RIII	RIII	RIII	RIII
-----SEE FOLLOWING PAGE-----			
Khanna 08/ /93	B. Burgess 08/ /93	McCabe 08/ /93	Ring 09/3 /93

start of the emergency diesel generator. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

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cc w/enclosures:

David P. Hoffman, Vice President
Nuclear Operations
David W. Rogers, Safety
and Licensing Director
OC/LFDCB
Resident Inspector, RIII
James R. Padgett, Michigan Public
Service Commission
Michigan Department of
Public Health
A. H. Hsia, LPM, NRR
SRI, Big Rock Point

bcc w/enclosures: PUBLIC-IE01

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W.C.
Forney
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Distribution

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