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

David W. Rogers  
Plant Safety and Licensing Director

July 7, 1994

Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - REPLY TO NOTICE OF VIOLATION - NRC INSPECTION REPORT NO. 93032 - UPDATE ON CORRECTIVE ACTIONS TAKEN

Our March 24, 1994 reply to a notice of violation concerning timely submittals of Licensee Event Reports (LERs) identified an action to avoid future noncompliance. The proposed action has since been changed from that stated in the original response. This letter provides a description of the action taken and how it differed from the original proposed action. The violation in IR 93032, dated February 22, 1994, concerned the failure to take effective corrective action to preclude repetitive failures to submit LERs within 30 days of an event in accordance with 10 CFR 50.73.

One of the corrective actions we had planned at the time of the violation response was to require a meeting of management to review event report evaluations. In the violation response the membership of that management meeting was described as consisting of the Plant Manager, the Nuclear Engineering and Construction Organization Manager (NECO), the Safety and Licensing Director, and the department representatives assigned the action.

Based on further reviews, it was decided that the management team members needed to review each event report would be a quorum of three managers, with specific management meeting membership dependent on the nature of and the responsibility area for the event being evaluated. The management review meeting, which is described as a management review board (MRB) meeting has been incorporated into the revised corrective action administrative procedure. The specific wording in the administrative procedure describes the MRB membership responsibility as follows:

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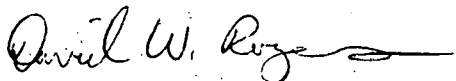
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"The MRB is comprised of the Plant Manager and the NECO Manager and their direct reports. A quorum consists of three members. The chairman shall be the Plant Manager for reportable condition reports (CRs) or Department Manager for non-reportable CRs. Action assignees may attend to explain the Corrective Action Plan. Plant Safety and Licensing shall attend for reportable CRs. Nuclear Performance Assessment Department (NPAD) is encouraged to attend all MRB meetings."

We believe that this MRB membership will assure proper management attention and a consistent and complete evaluation of reportable events. This review process is still in its infancy. Should future changes to the MRB membership be warranted, they will be made consistent with our administrative procedures changes process. Such change will be available for your review, however, no specific notification will be made to the NRC of those changes.



David W Rogers  
Director Plant Safety and Licensing

CC: Administrator Region III, USNRC  
Resident Inspector, Palisades

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To the best of my knowledge, information and belief, the contents of this  
submittal are truthful and complete.

By Robert A. Fenech  
Robert A. Fenech, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 7 day of July 1994.

LeAnn Morse  
LeAnn Morse, Notary Public  
Berrien County, Michigan  
Acting in Van Buren County, Michigan  
My commission expires: February 4, 1997

[SEAL]