



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

David W. Rogers
Plant Safety and Licensing Director

September 19, 1994

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - REPLY TO UNRESOLVED ITEM;
NRC INSPECTION REPORT No. 94008

NRC Inspection Report No. 94008, dated July 20, 1994, forwarded the results of a routine NRC safety inspection at the Palisades Nuclear Plant. The inspection report identified an unresolved item pertaining to an ineffective containment cleanliness inspection process. To facilitate the timely resolution of this item, Consumers Power Company agreed to respond in writing to describe what actions are planned to ensure future containment closeouts will be more effective. Attachment 1 provides a description of our plans to provide formal coordination of the containment closeout process. No commitments are contained within this response.

David W. Rogers
Plant Safety and Licensing Director

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

Attachment

273032

9409280281 940919
PDR ADOCK 05000255
D FDR

A CMS ENERGY COMPANY

LEO/11

ATTACHMENT 1

Consumers Power Company
Palisades Plant
Docket 50-255

REPLY TO UNRESOLVED ITEM

NRC INSPECTION REPORT No. 94008

September 19, 1994

REPLY TO UNRESOLVED ITEM

NRC Unresolved Item

The Inspector found the licensee's program for performing containment closeout was not fully effective. Although the licensee's checklist 1.3, "250# Heatup Checklist Containment Building," Rev. 24, required removal of transient equipment and other loose material from containment prior to plant startup, there was no mechanism, other than verbal notification to operations department, that other plant departments had the areas clean and ready for containment closeout inspection. The inspectors were concerned with the lack of coordination between station departments during the containment closeout.

This matter is considered an Unresolved Item pending further review by the licensee and the NRC (50-255/94008-01(DRP)).

CPCo Evaluation of the Unresolved Item

Consumers Power recognizes that coordination was weak between station departments for the containment closeout process during the 1994 forced outage. This lack of coordination resulted in unnecessary confusion during the cleanliness inspections. Ultimately the final inspection was properly completed prior to plant heat-up.

The root cause for the ineffective cleanliness inspections was the lack of a formal process owner to coordinate the preparation and performance of the cleanliness verifications. A contributor to this event was the inadequate communication of a more rigid containment cleanliness inspection standard which was created just prior to the closeout inspections. The existence of a formal process owner would have ensured the cleanliness standards were communicated to all appropriate personnel.

CORRECTIVE ACTIONS TO BE TAKEN

The following actions will ensure that future containment cleanliness inspections will be effective and formally coordinated. The completion of the actions is targeted for the First Quarter of 1995. Interim measures will be established to provide proper closeout inspections for any unplanned outages that could occur before the next refueling outage.

1. ESTABLISH A FORMAL PROCESS OWNER FOR CONTAINMENT CLEANLINESS INSPECTIONS

Revise Palisades Administrative Procedures to clearly identify that the Operations Department is responsible for coordination of containment cleanliness closeout inspections.

2. ESTABLISH A FORMAL PROCESS FOR CONTAINMENT CLEANLINESS INSPECTIONS

Revise Palisades Administrative Procedures to provide guidelines that will establish a consistent coordinated containment cleanliness inspection process. The process will include the addition of sequenced containment closeout activities into the generic outage schedule. The activities include an interdepartmental coordination meeting sponsored by the Operations Department to prepare for containment closeout inspections.

3. PROVIDE TRAINING FOR PLANT DEPARTMENTS PERTAINING TO PROCEDURE CHANGES

Provide training to applicable plant department personnel pertaining to the revised process for containment cleanliness closeout inspections.

Commitment Summary

The information in this letter provides a description of planned actions and is not considered to be a formal NRC commitment.