



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

November 27, 1995

U S Nuclear Regulatory Commission
Document Control Desk
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
RESPONSE TO INSPECTION REPORT OPEN ITEM 95009-01 CONCERNING
FOREIGN MATERIAL CONTROL

NRC Inspection Report 95009, dated September 15, 1995, requested a response to an Unresolved Item (95009-01) concerning foreign material exclusion (FME) from open systems and equipment.

Consumers Power Company had recognized weaknesses in our FME controls, and had initiated a detailed evaluation of the issue. This evaluation has been completed. An action plan to improve foreign material controls on the Palisades site has been developed. Actions are planned in four areas: prevention, planning, inspection, and management support.

The action plan for improving foreign material exclusion controls is provided as Attachment 1.

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.

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Manager, Licensing

CC Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

Attachment

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ATTACHMENT 1

**CONSUMERS POWER COMPANY
PALISADES PLANT
DOCKET 50-255**

**FOREIGN MATERIAL EXCLUSION
ACTION PLAN**

ATTACHMENT 1

ACTIONS TO IMPROVE FOREIGN MATERIAL CONTROL

BACKGROUND

An NRC routine inspection was conducted from July 4 through August 21, 1995. No violations of NRC requirements were identified during this inspection. However, a weakness was identified in the area of control of foreign material, and was designated Unresolved Item 95009-01. Consumers Power Company recognized these weaknesses and initiated a detailed evaluation. This evaluation was intended to result in a comprehensive action plan to improve foreign material controls on the Palisades site. In response to the NRC concern, Consumers Power Company agreed to submit that action plan to the staff.

PLANNED ACTIONS TO IMPROVE CONTROL OF FOREIGN MATERIAL

The Consumers Power Company action plan to improve foreign material control at the Palisades site includes actions in the areas of prevention, planning, inspection, and management support. These actions are as follows:

I. Prevention

The first, and probably most important, area in which actions will be taken is in the area of prevention. Prevention is to be addressed by training and by constructing better foreign material barriers (where appropriate).

Training will be given to all personnel who have potential to be involved with foreign material control. The training will include:

A. The following items will be incorporated into initial General Employee Training (GET) Lesson Plan GET-G-103, Revision #5:

1. A definition of Foreign Material.
2. An example of a Foreign Material Exclusion (FME) Event that occurred at the Carolina Power and Light Robinson Nuclear Plant. The event occurred when parts from a refueling tool came loose and lodged in the control rod guide tube of a fuel bundle. In addition, examples of Palisades foreign material control problems will also be reviewed.
3. INPO Videotape "Keeping Foreign Materials out of Plant Systems".
4. Student awareness of Palisades Administrative Procedure 5.09, "Foreign Material Exclusion", and their ability to contact their supervisors for additional information on Foreign Material Exclusion.

B. Job-specific pre-outage training on FME will be developed and presented to Mechanical Maintenance, Electrical Maintenance and I&C. The importance of cleanliness inspections after job completion

and prior to closing the system, per Administrative Procedure 5.09, will be emphasized.

- C. Job-specific pre-outage training on FME will be developed and presented to Chemistry and Health Physics personnel. A discussion of Administrative Procedure 5.09 will be included.
- D. Pre-outage training on FME for Engineering Support Personnel will be developed and presented. The importance of cleanliness inspections after job completion and prior to closing the system, per Administrative Procedure 5.09, will be emphasized.
- E. Job-specific pre-outage training on FME for Operations personnel will be developed and presented. The changes to FME policies and procedures will be included.
- F. A specific training module for Contractors on FME will be developed. An alignment with training will assure that a systematic approach is followed. A requirement will be added to Administrative Procedure 5.17, "Training and Qualification for Nonpermanent Plant Employees and Contracted Services Personnel" in sections 6.1.3.d, 6.2.1.c, and 6.5.3.c to require a review of Administrative Procedure 5.09.
- G. A presentation will be given to Planners and Schedulers on incorporation of the FME process into Work Order planning. A discussion of Administrative Procedure 5.09 will be included.
- H. System Engineers will be assigned to discipline specific Maintenance Department Continuing Training sessions related to FME, as appropriate.

Also, as a part of prevention, debris barriers around the Reactor Cavity Debris Free Zone (DFZ) will be made higher and sturdier to prevent migration of material into a DFZ.

II. Planning

The second area to be addressed is Planning. FME practices must be considered and included in the Work Order Planning process. MSM-M-20 "Maintenance Cleanliness Guidelines" and MSM-M-47 "Foreign Material Exclusion In The Spent Fuel Pool Area and Reactor Cavity" are being replaced with a new Administrative Procedure (AP 5.09). Planners will be expected to become familiar with the new Administrative Procedure 5.09 and incorporate specific requirements in each Work Order, as appropriate.

III. Inspection

Area number three is Inspection. New Administrative Procedure 5.09 will require that cleanliness inspections will be performed by the Lead Repairperson or Supervisor after job completion and prior to closing the system. The inspection will be documented on the Work Order.

IV. Management Support

The fourth area to be addressed is Management Support. Management expectations and standards of performance regarding FME will be established. They will then be clearly communicated to and well understood by each worker. These expectations will be reinforced, not only during training, but also during pre-job briefings and monitoring of work activities.