

September 14, 1998

Mr. Thomas J. Palmisano  
Site Vice President and General Manager  
Palisades Nuclear Generating Plant  
27780 Blue Star Memorial Highway  
Covert, MI 49043-9530

SUBJECT: PALISADES PUBLIC MEETING AT THE NRC REGION III OFFICE

Dear Mr. Palmisano :

This letter confirms the discussion between myself and other members of the NRC Region III staff and you, accompanied by various members of your staff, in a public meeting on August 4, 1998.

The purpose of this meeting was to discuss various radiation protection problems that have occurred at your facility, and the completed and planned actions that your staff has developed to correct the problems. The issues discussed during this meeting are noted on the attached meeting agenda, which was prepared and distributed by your staff. Our office believes that your staff has made an accurate assessment of the issues and we encourage your staff to continue their efforts to identify and correct issues at your facility to ensure the safe and effective operation of your facility.

We will gladly discuss any questions you may have concerning this matter.

Sincerely,

Original /s/ S. A. Reynolds

*for* John A. Grobe, Director  
Division of Reactor Safety

Docket No. 50-255  
Licensee No. DPR-20

Enclosure: As stated

See Attached Distribution

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T. Palmisano

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cc w/encl: R. Fenech, Senior Vice President, Nuclear  
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# **RADIATION PROTECTION ISSUES MEETING**

## **AGENDA**

1. Opening ..... TJPalmisano  
DWRogers
2. Event Characterization ..... MPBanks
  - Postings/boundaries
  - Work planning
  - Worker practices
3. Investigation and Corrective Actions ..... MPBanks
  - Team investigation
  - Root causes
  - Corrective actions
4. Broader Implications ..... MPBanks
  - Focus
  - Monitoring and reinforcement
  - Self-assessment/benchmarking
  - Culture change
5. Site-Wide Implications ..... DWRogers
6. Summary ..... DWRogers
7. Closing ..... TJPalmisano

## **MULTI-DISCIPLINE REVIEW TEAM**

- Investigated individual Condition Reports
- Identified failed barriers and failure modes
- Performed common cause analysis
- Determined root causes
- Reviewed past corrective action effectiveness

## **ROOT CAUSES**

- Management expectations
- Pre-job planning
- Strengthen defenses for radiologically significant activities
- Attention to radiological issues by contract HP technicians and radworkers

## **CORRECTIVE ACTIONS**

- **Management Expectations**
  - Communicate expectations
  - Formalize expectations
  - Monitor and reinforce expectations
- **Pre-job Planning**
  - Emphasize thorough pre-job planning
  - Briefings for HRA and RCD entry
  - 1999 Refueling Outage
- **Strengthen Defenses for Radiologically Significant Activities**
  - RCD double verification
  - Establish limiting dose rates
  - Checklist/verification for HRA changes
- **Attention to Radiological Issues by Contract HP Technicians and Radworkers**
  - Communication and monitoring
  - Revision of Refueling Manual
  - Increase visibility of radiologically significant areas