

July 13, 1998

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
REPLY TO NOTICE OF VIOLATION 50-255/98005-01 - INADEQUATE PROCEDURAL
GUIDANCE REGARDING FOREIGN MATERIAL EXCLUSION CONTROLS FOR
ELECTRICAL EQUIPMENT

NRC Inspection Report 50-255/98005(DRP) dated June 11, 1998, cited one violation regarding inadequate procedural requirements for foreign material exclusion control for safety related electrical components.

The response to the violation is provided in the Attachment.

Consumers Energy Company agrees with the violation.

SUMMARY OF COMMITMENTS

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



Thomas J. Palmisano
Site Vice President

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


Attachment

9807210291 980713
PDR ADOCK 05000255
G PDR

I to

CONSUMERS ENERGY COMPANY

To the best of my knowledge, the contents of this REPLY TO NOTICE OF VIOLATION 50-255/98005-01 - INADEQUATE PROCEDURAL GUIDANCE REGARDING FOREIGN MATERIAL EXCLUSION CONTROLS FOR ELECTRICAL EQUIPMENT are truthful and complete.

By 
Thomas J. Palmisano
Site Vice President

Sworn and subscribed to before me this 13th day of July 1998.



Mary Ann Engle, Notary Public
Berrien County, Michigan
(Acting in Van Buren County, Michigan)
My commission expires February 16, 2000

ATTACHMENT

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

REPLY TO NOTICE OF VIOLATION 50-255/98005-01

**INADEQUATE PROCEDURAL GUIDANCE
REGARDING FOREIGN MATERIAL EXCLUSION CONTROLS
FOR ELECTRICAL EQUIPMENT**

ATTACHMENT

REPLY TO NOTICE OF VIOLATION 50-255/98005-01 INADEQUATE PROCEDURAL GUIDANCE REGARDING FOREIGN MATERIAL EXCLUSION CONTROLS FOR ELECTRICAL EQUIPMENT

NRC NOTICE OF VIOLATION

During an NRC inspection conducted from March 14 through May 6, 1998, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, on or about April 26, 1998, the inspectors identified that Palisades Administrative Procedure 5.09, "Maintenance Cleanliness Standards," Revision 6, was inappropriate to the circumstances in that it failed to prescribe adequate foreign material exclusion controls for safety-related electrical equipment, an activity affecting quality.

This is a Severity Level IV violation (Supplement I).

CONSUMERS ENERGY COMPANY RESPONSE

Consumers Energy Company agrees with this violation as written.

BACKGROUND

On April 26, 1998, maintenance personnel removed the generator inspection screens on emergency diesel generator EDG 1-1 to facilitate planned preventive maintenance. During the course of the activity, an NRC inspector approached the work area and found the inspection screens removed and the openings uncovered with no maintenance personnel present. Maintenance personnel had temporarily left the job site, but had not taken action to cover the generator openings.

Consumers Energy has implemented industry standards regarding Foreign Material Exclusion (FME). The general expectation for control of foreign material during maintenance is to assure that any opening is covered when maintenance personnel are not in the area. This applies to any safety related equipment including large electrical

equipment. For this job, expectations provided by maintenance supervision were not followed by electrical maintenance personnel.

In accordance with Administrative procedure 5.09, "Maintenance Cleanliness Standards" a final inspection was completed to verify that no foreign material was inadvertently left in the generator. This activity was completed with no foreign material found.

REASON FOR VIOLATION

The FME requirements of Administrative Procedure 5.09 "Maintenance Cleanliness Standards," are intended to extend to the performance of work on safety related electrical equipment, however performance expectations for implementation of FME controls were not fully met during work on the emergency diesel generator.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Management expectations that appropriate precautions be taken to minimize the introduction of foreign material into safety related electrical equipment during maintenance activities have been reinforced with electrical maintenance personnel, supervisors and job planners.

CORRECTIVE ACTIONS REMAINING TO AVOID FURTHER VIOLATIONS

Administrative Procedure 5.09, "Maintenance Cleanliness Standards," will be revised to more clearly indicate that foreign material exclusion requirements apply to work on safety related electrical equipment.

DATE WHEN COMPLIANCE WILL BE ACHIEVED

Consumers Energy is in full compliance.