REACTOR FACILITIES BRANCH

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Consumers Power Company

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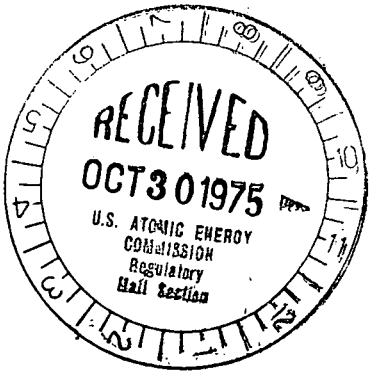
General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

October 28, 1975



Mr James G. Keppler
Office of Inspection Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255, LICENSE DPR-20
PALISADES PLANT, CITATION RESPONSE

This letter is written to explain the corrective action taken with respect to apparent infractions reported in your IE Inspection Report 050-255/75-16 transmitted by letter dated October 6, 1975. Also included in our response are the actions taken or planned with respect to other signigicant items as requested in your transmittal letter.

In our review of the deficiencies observed in your report we have concluded that our management of environmental monitoring requirements needs improvement. We are in the process of reviewing and formalizing appropriate changes to our organization and are confident that when these changes are completed it will be unlikely that these types of deficiencies will recur. Specific responses to the described deficiencies are discussed below.

Described Deficiency

Contrary to Sections 3.9.9 and S-1.1 of the Technical Specifications, plant discharge effluent heat rate greater than 0.5 billion Btu/h and/or discharge temperature increases greater than 5°F were exceeded on March 29, April 4, 6, 19, June 19 and 30, 1975. The noncompliance items of March 29, April 19 and June 30, 1975 were identified by the inspectors. The noncompliance items of April 4, 6 and June 19, 1975 were identified by the licensee and reported as Abnormal Occurrence Reports 75-6, 75-7 and 75-13, respectively.

Discussion and Corrective Action

The thermal discharge to the lake has been and is continuing to be investigated by plant personnel in an effort to determine the source(s) of the discharge. Investigation has shown that a portion of the thermal discharge is due to the excess service water which flows into the mixing basin or causes condenser cooling system water (which it displaces) to flow into the mixing basin. While the service water thermal discharge is not limited by the Technical Specifications (5°F and 5 x 10^8 Btu/h), the thermal discharge from the closed-cycle condenser cooling system is.

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The original measurements of discharge temperature were taken by placing a thermometer in a radwaste composite sample stream taken from the outfall of the mixing basin. Our investigation showed that this measurement was in error (high), due to passage of the sample line through the warmer makeup basin prior to its discharge in the composite sample basin. A temporary temperature sensor was arranged in the mixing basin outfall following discovery of this deficiency and permanent temperature sensors have now been installed. Manual measurements of temperature will be used as backup when required.

A permanent sensor has also been installed in the critical service water header to improve our intake water temperature measurement. Manual measurement of temperature will be used as backup when required.

We are still awaiting shipment of equipment for measurement of dilution water flow. We now expect this equipment to be delivered about November 1, 1975.

A permanent temperature sensor has also been installed at a service water discharge point; however, we are experiencing some operational problems with this sensor. We expect these problems to be resolved in the near future.

When the above-mentioned equipment becomes fully operational, we expect to be able to fully document plant thermal discharges and essentially eliminate this type of occurrences during normal operation.

Described Deficiency

B. Contrary to 10 CFR 20.201(b) evaluations were not performed for radiological environmental air sampling concentrations or thermoluminescent dosimeter monitoring anomalous results.

Discussion and Corrective Action

In an effort to improve the monitoring program and correct the deficiencies noted, procedures have been written covering the collection of environmental samples. Independent reviews, by the plant and General Office staff, of collection data and analytical results will be initiated.

Significant changes in the thermoluminescent dosimeter (TLD) program are being planned which will eliminate the deficiencies observed.

We expect the corrective actions described above to be fully implemented about December 1975.

Described Deficiency

C. Contrary to Section 6.4.1.g of the Technical Specifications, approved written procedures and checkoff lists were not available, such that sufficient and pertinent measurements and observations were not made consistently to assure implementation and compliance with the chlorine treatment Technical Specifications sections.

Discussion and Corrective Action

Procedures and check sheets are being written to cover chlorine measurements and required observations during chlorination of the condenser cooling system. We expect the corrective action described above to be fully implemented by about December 1, 1975. In the interim, we have instructed the staff to insure that all required samples and observations are conducted in accordance with the Technical Specifications.

Other Significant Items

Item A

Environmental air sampling station components continue to show deterioration although the licensee has made an effort to upgrade the equipment.

Discussion and Corrective Action

We are making improvements in the weekly operability checks (performed by the sample collector) and developing procedures to be used by plant personnel for overchecking of the sample collector's activities. We expect these changes to increase the sampling system reliability by detecting abnormal operating trends before problems develop.

We expect these improvements to be completed by about December 1, 1975.

Item B-1

An attempt to shorten the time interval between sample collection and receipt of analytical results has not produced effective results.

Discussion and Corrective Action

As observed above, attempts to shorten the time interval between sample collection and receipt of analytical results has not been satisfactory (with the present analytical environmental contractor). We are discussing our analytical requirements with a different contractor and expect to reach agreement with them such that they will begin performing these services in December 1975.

Item B-2

Documentation defining the administrative and procedural controls (responsibility assignment) for implementation of the environmental monitoring program has not been developed.

Discussion and Corrective Action

We are unable to make a complete response to this question at the present time. We expect this response to be submitted about November 15, 1975.

Item B-3

A weekly field operability check to identify defective air sampling equipment has not been effectively implemented.

Discussion and Corrective Action

Please see Item A of "Other Significant Items" above.

Item B-4

An evaluation of the adequacy of the environmental monitoring thermoluminescent dosimeter program has not been conducted.

Discussion and Corrective Action

We are discussing our TLD monitoring program with a different analytical environmental monitoring contractor and expect to reach agreement with them such that they will begin performing these services in December 1975. This new program will be periodically evaluated by members of the General Office or plant staff in accordance with appropriate procedures. A thorough evaluation will be made following the collection of the first year exposure data (about January 1977).

Item B-5

Documentation of investigatory efforts into unusual environmental monitoring results has not been developed.

Discussion and Corrective Action

We are unable to make a complete response to this question at the present time. We expect this response to be submitted about November 15, 1975.

Item E

Contrary to the licensee's reply to noncompliance items identified in a previous inspection, a program to check the completeness of their analytical environmental contractor's work has not been finalized.

Discussion and Corrective Action

A program to check the completeness of analytical environmental contractor's work is being initiated and should be fully implemented about December 1, 1975.

Miscellaneous Items

In addition to our concern for corrective action with respect to the specific items of noncompliance noted, we are concerned about your system for management control of the environmental monitoring activities that has permitted these items to occur. Consequently, in your reply to this letter, you should describe, in particular, those actions taken or planned to improve the effectiveness of your management control over environmental monitoring activities.

Discussion and Corrective Action

We are in the process of reviewing and formalizing appropriate changes to our management organization and are unable to make a complete response to this question at the present time. We expect this response to be submitted about November 15, 1975.

David A. Bixel (Signed)

David A. Bixel
Assistant Nuclear Licensing Administrator

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