



**Consumers  
Power  
Company**

David J VandeWelle  
Director of  
Nuclear Licensing

General Offices: 1945 West Parnell Road, Jackson, MI 49201 • (517) 788-1636

September 24, 1984

James G Keppler, Administrator  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - SUPPLEMENTAL RESPONSE TO IE INSPECTION REPORT 84-09

Three items of noncompliance were identified in IE Inspection Report 50-255/84-09 dated June 29, 1984. Consumers Power Company letter of July 27, 1984 requested an extension and committed to providing the response to this inspection report by August 10, 1984. Consumers Power Company letter of August 10, 1984 provided the response. NRC letter of August 24, 1984 acknowledged receipt of our response and requested a supplemental response for two items. This is our supplemental response to these items, which has been agreed upon by members of our respective staffs.

Noncompliance (50-255/84-09-01A)

10 CFR 50, Appendix B, Criterion V, as implemented by the Quality Assurance Program (CPC-2A) which includes a commitment to ANSI N18.7-1976, requires that activities affecting quality be prescribed by documented instructions and procedures which include appropriate qualitative and quantitative acceptance criteria and be accomplished in accordance with those instructions and procedures.

Contrary to the above, the following examples of failure to have or follow appropriate procedures were identified:

- a. No acceptance criteria, as required by ANSI N18.7-1976, paragraph 5.3, were specified in either surveillance procedure RM-45 or Wyle test procedure No 6108-545 for surveillance activities of mechanical snubber operability.

B41010007B B41005  
PDR ADUCK 05000255  
G PDR

SEP 28 1984

Corrective Action Taken and Results Achieved:

The lack of an adequate snubber surveillance procedure resulted from a failure to fully implement Amendment 69 (March 12, 1982) to the Palisades Technical Specifications. A complete review of Amendment 69 has been conducted, and the procedural changes necessary for full implementation of the amendment have been made. Since the issuance of Amendment 69, procedural controls have been instituted to ensure amendments to Technical Specifications are fully implemented in a timely manner (reference 83-070).

While the required acceptance criteria were not included in the hydraulic snubber surveillance procedure, RM-45, the necessary data was collected during the testing performed for the 1983-84 refueling outage. A set of acceptance criteria was subsequently developed and compared to the test data. All of the hydraulic snubbers, with the exception of two, met the established acceptance criteria. While data from two of the hydraulic snubbers was slightly outside the acceptance range, a subsequent engineering analysis determined the snubbers are acceptable.

Corrective Action to be Taken to Avoid Further Noncompliance:

Technical Specification 4.16.1.c requires functional testing of a representative sample (10% of the total safety-related snubbers) once per refueling cycle. At Palisades, a representative sample would include, on average, one mechanical snubber each refueling cycle. While one mechanical snubber was tested during the 1983-84 refueling outage, the testing was not in accordance with Specification 4.16.1.e. Accordingly, a new mechanical snubber surveillance procedure RM-89, incorporating Specification 4.16.1.e, has been developed and approved. A mechanical snubber has been removed from service and sent to Wyle Laboratories for testing, in accordance with the new procedure. The testing and reinstallation of the snubber will be completed prior to startup from the current maintenance outage.

Date When Full Compliance Will be Achieved:

Full compliance will be achieved prior to startup from the current maintenance outage.

Noncompliance (50-255/84-09-10)

10 CFR 50, Appendix B, Criterion IV, as implemented by Section 4 of Consumers Power Quality Assurance Program Description for Operational Nuclear Power Plant (CPC-2A), requires measures to be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in documents for procurement.

Contrary to the above, purchase order 1004-3428-CQ, for the spare boric acid pump motor, did not specify adequate technical and quality requirements. Also include in your response to this item the procurement of safety-related items from suppliers not on the Nuclear Operations Department Approved Suppliers List.

Explanation:

The Palisades Plant Administrative Procedures allow the procurement of certain commercial quality items for use in safety related systems and components. Such procurements are known as "CQ" procurements. The CQ designation identifies the item as being 1) safety related, and 2) commercial grade. A safety related item may be procured as CQ if it meets all three of the following criteria:

- a. The item is not subject to design or specification requirements that are unique to nuclear power facilities and activities,
- b. The item is used in applications other than nuclear power facilities and activities, and
- c. the item is to be ordered from the manufacturer/supplier on the basis of specifications set forth in the manufacturer's published description (eg, a catalog, a vendor manual).

Once the determination has been made that an item is CQ, the item may be procured from the supplier who has not been evaluated and placed on the Nuclear Operations Department Approved Suppliers List (NODASL), if all the following are true:

- a. The item is relatively simple and standard in design, manufacture and test ability,
- b. The item is adaptable to standard or automated inspections or tests of the end product to verify quality characteristics after delivery, and
- c. Receiving inspection of the item does not require operations that could adversely affect the integrity, function or cleanliness of the item.

When a CQ item is procured from a supplier who is not on the NODASL, source verification and/or receipt inspection activities provide the necessary controls.

The Palisades Q-List identifies both the boric acid pump and the pump motor as being safety related. The Q-List specifically designates the pump as being safety related for seismic reasons. The listing for the pump motor, however, does not contain any information that the motor must also meet seismic

JGKepler, Administrator  
Palisades Plant  
SUPPLEMENTAL RESPONSE TO  
IEIR 84-09  
September 24, 1984

4

criteria. Therefore, the inadequate classification of the pump motor in the Q-List allowed the motor to be purchased as a C procurement, rather than appropriately as a Q procurement.

Subsequently, the vendor could not supply the exact motor which was specified and a replacement motor was substituted. During receipt inspection, a Nonconforming Material Report (NMR) was issued to address the motor substitution. The NMR required that the motor not be released for installation until appropriate documentation to address the change in design specification had been completed.

Palisades Plant Administrative Procedure 9.04 requires that changes in design specification be documented via a Specification Change (SC). The preparation of a SC requires that applicable codes, technical documents and design reference documents be researched to ensure that the design change is technically acceptable. Additionally, the SC includes a safety evaluation which addresses 10CFR50.59 considerations and receives technical, quality assurance and Plant Review Committee (PRC) approval. Therefore, adequate controls are in place to address all technical and quality concerns prior to installation of the motor, despite the lack of certain specific requirements on the purchase order itself.

Corrective Action Taken and Results Achieved:

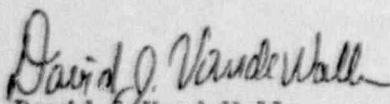
A hold tag has been placed on the spare boric acid pump motor.

Corrective Action Taken to Avoid Further Noncompliance:

The Palisades Q-List will be corrected to indicate that the boric acid pump and motor are seismically qualified as a unit. This information will facilitate the incorporation of seismic requirements into future purchase orders.

Date When Full Compliance Will be Achieved:

Full compliance will be achieved by October 1, 1984.

  
David J. VandeWalle  
Director, Nuclear Licensing

CC Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement  
NRC Resident Inspector - Palisades