

PENDIX A

NOTICE OF VIOLATION

Consumers Power Company  
Palisades Nuclear Power Plant

Docket: 50-255  
Operating License: DRF-20

As a result of the inspection conducted on July 24 through August 4, 1989, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989) (Enforcement Policy), the following violations were identified:

- A. Criterion II of Appendix B to 10 CFR Part 50 requires in part that the licensee shall have a program that will ". . . provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained."

Contrary to the above, the licensee did not have an adequate program for training auxiliary operators (AOs) on the actions that they were to perform as stated in the emergency operating procedures (EOP), in that none of the six AOs interviewed had been trained on, or walked through these actions. The licensee had also failed to fully implement the provisions of the existing training program which dealt with training on activities required under the EOPs.

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

- B. Criterion XVIII of Appendix B to 10 CFR Part 50 requires in part that ". . . A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

Contrary to the above, the licensee failed to perform planned and periodic audits of the Palisades Emergency Operating Procedures from June 1986 until July 1989. This was evidenced by the fact that during this period no QA audits of the EOPs had been performed, and the one surveillance which extended over a two year period failed to identify ineffective training of some operations personnel, and inadequacies with the verification and validation program.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including for each violation: (1) the corrective steps that have been taken and the results achieved; (2) the corrective steps which

steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

October 18, 1989  
Dated

Hubert J. Miller  
Hubert J. Miller, Director  
Division of Reactor Safety