

NOTICE OF VIOLATION

Consumers Power Company  
Palisades Nuclear Plant

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

During an NRC inspection conducted on July 8 through July 20, and August 19 through 27, 1993, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50.59 (b)(1) requires in part that the licensee have a written safety evaluation which provides the bases for determination that a change in the facility as described in the Safety Analysis Report does not involve an unreviewed safety question. Section 3.3.2.6 of the Updated Safety Analysis Report describes use of hafnium poisoned assemblies as part of a neutron fluence reduction program.

Contrary to the above, the licensee's 50.59 evaluation of extended use of hafnium poisoned I-series fuel assemblies for cycles 10 and 11 did not provide complete bases for the determination that there was no unreviewed safety question. Specifically, the evaluations did not include consideration of the effects of the neutron spectrum at the periphery of the core (which was proportionally higher in "fast" neutrons and lower in "thermal" neutrons compared to non-periphery locations) on mechanical properties of the assemblies. These evaluations were therefore incomplete.

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

- B. 10 CFR 50, Appendix B, Criterion XI, requires that a test program be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures.

Contrary to the above, the licensee's Cycle 10 radiochemistry testing did not positively identify failed I-series fuel, nor was additional testing performed between cycles 10 and 11 to assure I-series fuel would perform satisfactorily for a sixth cycle, which constituted a unique fuel performance demand.

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

- C. 10 CFR 50, Appendix B, Criterion XVI, requires in part that measures be established to assure that conditions adverse to quality are promptly identified and corrected. In the case of significant conditions adverse to quality the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, when the upper guide structure (UGS) was lifted from the reactor on July 6, 1993, and a fuel bundle from core location Z-11 stuck onto the UGS, it marked the third occasion for this same interference between core components.

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

D. Technical Specification 6.8.1.b requires that written procedures be established, implemented and maintained for activities covering refueling operations.

1. Licensee procedure RVI-M-1, Revision 16, "Removal and storage of the Upper Guide Structure," provided instructions for installation for a TI-2000 load cell readout device only.

Contrary to the above, on July 6, 1993, while lifting the UGS, a J-300 load cell readout device was used.

2. Licensee procedure RVI-M-1, Revision 16, "Removal and storage of the Upper Guide Structure," Section 5.3.6.g, includes a stipulation to follow Work Order No. 24301781 for steps to use a load cell. Step 3.3.A.7 of the work order requires that the load cell readout device be zeroed.

Contrary to the above, on July 6, 1993, while performing procedure RVI-M-1, the load cell readout device was not zeroed.

3. Licensee procedure RVI-M-1, Revision 16, "Removal and storage of the Upper Guide Structure," Section 5.3.14, specifies an upper load limit of 62,000 pounds.

Contrary to the above, on July 6, 1993, while performing procedure RVI-M-1, after the UGS was raised approximately six inches, indicated load reached 62,800 pounds, which is in excess of the upper load limit.

4. Licensee procedure FHSO-18, "Recovery of Bundle SAN-8," requires in steps 4.2.6 and 5.2.1 that chainfall tension be limited to a combined load of 1500 - 1600 pounds.

Contrary to the above, on July 7, 1993, the chainfalls were tightened to a combined load of 2300 pounds.

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

Pursuant to the provisions of 10 CFR 2.201, Palisades Nuclear Plant is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Glen Ellyn, Illinois  
this 25 day of October 1993