

January 4, 1983

Docket No. 50-255

Consumers Power Company  
ATTN: Mr. R. B. DeWitt  
Vice President  
Nuclear Operations  
212 West Michigan Avenue  
Jackson, MI 49201

Gentlemen:

Thank you for your letter of December 2, 1982, regarding improvements to be made in the Radiological Environmental Monitoring Program at Palisades following our September 1982 inspection (RIII Report 255/82-22). We will review these during a subsequent inspection.

Your cooperation is appreciated.

Sincerely,

*M. Schumacher for*

C. J. Paperiello, Chief  
Emergency Preparedness and  
Program Support Branch

cc: D. J. Vandewalle, Nuclear  
Licensing Administrator  
R. W. Montross, Manager

cc w/ltr dtd 12/2/82:  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
Ronald Callen, Michigan  
Public Service Commission

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Consumers  
Power  
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

December 1, 1982

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 - RESPONSE TO IE INSPECTION REPORT 82-22

IE Inspection Report No 50-255/82-22 dated October 28, 1982 reported the results of a routine safety inspection conducted on September 20-24, 1982. Addressed in the report were two items of noncompliance to which responses are required. The items of noncompliance and responses thereto are given below. Consumers Power Company is requesting, by way of this letter, that the second item of noncompliance be withdrawn. The details of this request are given after the response to the second item of noncompliance addressed in this letter.

#### ITEM

Section 4.11.1 of the Technical Specifications, Appendix A, states in part "Radiological environmental samples shall be taken according to the following schedule."

This schedule specifies that milk is to be collected monthly when available from four sites.

Contrary to the above, from February 1981 until May 1982 milk was collected from only three sites.

#### RESPONSE

##### DISCUSSION

Prior to February 1981, milk samples were gathered from four milk production sites as specified in Technical Specifications section 4.11. One of these sites was the Kalamazoo Dairy which served as the monitoring program control site. In February 1981, a fire damaged the Kalamazoo Dairy to the extent that milk samples could not be obtained. Monthly

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attempts were made to obtain milk from the Kalamazoo Dairy, but it was not until August 1981 that the dairy informed Consumers Power that milk samples would no longer be provided. A determination was made, after reviewing Technical Specifications section 4.1.1, that we were not in violation of the Technical Specifications since the control milk sample was not available. A new sample point was not selected until May 1982 because of confusion regarding the responsibility for establishing the new site.

#### CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

Four milk samples have been taken monthly since May 1982. Note, however, that since the missed samples were for the Palisades control site only, we recognized, during the period from February 1981 to May 1982, that control samples from a site near the Big Rock Point Plant could have been substituted if necessary.

#### CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

The basic responsibilities for the environmental monitoring program are established in new Nuclear Operations Department Standard H05. Furthermore, the Radiological Services Department procedures will be revised to translate these basic requirements into the working level details necessary to prevent recurrence.

#### DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

February 1, 1983.

#### ITEM

Section 6.9.3.2 of the Technical Specifications, Appendix A, states in part: "A report shall be submitted in the event that (a) the radiological monitoring programs are not substantially conducted as described in Section 4.11; . . . reports shall be submitted within 30 days."

Contrary to the above, no report was submitted when it became apparent that all samples specified in Section 4.11.1 of Appendix A Technical Specifications were not being collected.

#### DISCUSSION

We have completed an investigation which confirmed that a review was conducted to determine reportability at the time of the missed samples. Since the missed samples were the control samples, and adequate backup

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was available from the Big Rock Point Plant control site, we concluded that the missing samples did not in fact constitute a substantial degradation in the radiological environmental monitoring program. Accordingly, no special report was submitted to the NRC.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

Responsibilities for the environmental monitoring program are established in the new Nuclear Operations Dept Standard H05. Furthermore, the Radiological Services Dept procedures are being revised to translate these requirements to working level detail necessary to prevent recurrence. Specifically, all discrepancies and evaluations of the program are to be documented to file and multiple discrepancies are to be entered into the corrective action system.

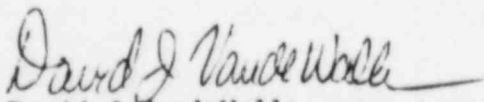
DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

February 1, 1983.

REQUEST FOR ITEM OF NONCOMPLIANCE TO BE WITHDRAWN

We believe that this cited noncompliance is directly related to the first item of noncompliance and should have been included with the first item as a single noncompliance. We view the segregation of this event into two noncompliances as not appropriate given the publication of other items of noncompliance which were not as closely related as this event, but were combined into a single noncompliance.

Based upon the results of the investigation described above, Consumers Power Company contends that the radiological environmental monitoring program was substantially conducted and no report was required as per Palisades Technical Specification 6.9.3.2. Therefore, we request that this item of noncompliance be withdrawn.



David J Vandewalle  
Nuclear Licensing Administrator

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