



Consumers
Power
Company

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October 29, 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 82-20

The NRC reported the results of a routine safety inspection conducted during August 1982 in IE Inspection Report No 50-255/82-20. Addressed in the report was one item of noncompliance to which a response is required. The item of noncompliance and response thereto is as follows:

Item:

Technical Specification 6.8.1 requires that written procedures recommended in Appendix A of Regulatory Guide 1.33 be implemented. Appendix A of Regulatory Guide 1.33 includes administrative and test procedures. Administrative Procedure 4.0 requires Shift Supervisor "command oversight" and "management review of ongoing operations important to safety." Procedure T-157, "DBA Sequencer Test", implements the requirements of Administrative Procedure 4.0 by stipulating at Step 3.1 that Shift Supervisor permission be obtained to perform the test.

Contrary to the above, on August 31, 1982, Procedure T-157 was revised during implementation, and new steps involving bypass of safety functions were performed, without obtaining the permission of the Shift Supervisor.

Response:

Corrective Action Taken and Results Achieved

As stated in IE Inspection Report 82-20, the Component Cooling Water (CCW) valve to containment shut during the second attempt to complete the "DBA Sequencer Test", procedure T-157. To ensure adequate cooling water flow to the primary coolant pumps, a temporary change to procedure T-157 was completed in accordance with Administrative Procedure 10.41, and approved by the oncoming Shift Supervisor. The procedure was not to be restarted until after shift change; consequently, the Shift Supervisor on duty was not briefed on the temporary change

Corrective Action Taken and Results Achieved (Continued)

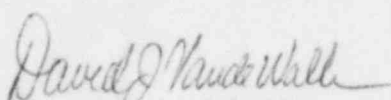
to T-1:7. Due to poor communications, one of the engineers involved in the test thought he had permission to fail the CCW valve to containment open prior to shift change and informed the Control Operator of his intentions via radio. Because of loud background noise in the CCW room, the Control Operator did not realize that the valve was to be failed open. Immediately after the air to the CCW valve was isolated, the operating crew discovered the improper action and had the system restored to its proper condition. The event was immediately reviewed with the engineers and technicians involved in order to stress the importance of obtaining proper authorization prior to conducting tests and procedures.

Corrective Action To Be Taken To Avoid Further Noncompliance

A letter will be sent to all engineers and supervisors to re-emphasize the Plant policy that valve and equipment manipulations should be performed by operators only and that specific approval from the Shift Supervisor is required prior to performing safety related operations. Additional training will be provided to engineers and supervisors during implementation of revised Plant Administrative Procedures in November and December 1982.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.



David J VandeWalle
Nuclear Licensing Administrator

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