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February 14, 1983

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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 82-28

IE Inspection Report No 50-255/82-28 dated January 14, 1983 reported the results of a routine safety inspection conducted during November 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.

Item:

Technical Specification 6.8.1.a requires that written procedures recommended in Appendix A of Regulatory Guide 1.33 be implemented. Appendix A of Regulatory Guide 1.33 includes Administrative Procedures. Administrative Procedure 4.0, paragraph 5.4.5.B, requires review of completed checklist "Exceptions Sheets" to identify which valve required positions should be permanently changed, and initiation of the required changes.

Contrary to the above, the required change was not initiated after the "Exception Sheet" for Checklist 12.5 identified a need for a permanent change to the required position of valve MV-709-FW when the checklist was twice performed on August 4, 1982.

Response:

Corrective Action Taken and Results Achieved

Checklist 12.5 has been revised to reflect the proper required position of valve MV-709-FW

Corrective Action To Be Taken To Avoid Further Noncompliance

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At the time the noncompliance was noted, the Training Shift Supervisor had the responsibility of reviewing checklist exception sheets to determine which required positions would be permanently changed on the checklist. Furthermore, he was responsible for initiating the required changes. Due to illness, however, the Training Shift Supervisor missed a substantial amount of time during the months of September, October, November and December 1982, creating a significant backlog, which impacted on the priority placed upon checklist revisions. A subsequent change to the Palisades Plant Administrative Procedures now places this responsibility on the Administrative Shift Supervisor. This position, however, is currently vacant.

To prevent recurrence until the position of Administrative Shift Supervisor can be permanently filled, the responsibility for updating checklists will be assigned to a Shift Supervisor.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved with the assigning of this responsibility to a Shift Supervisor by February 15, 1983.

Item:

Technical Specification 6.8.1.a requires that written procedures recommended in Appendix A of Regulatory Guide 1.33 be implemented. Appendix A of Regulatory Guide 1.33 includes procedures for performing maintenance which can affect the performance of safety related equipment. Procedure MSM-M-10, "Control of Welding", requires implementation of welding activities using a Repair Inspection Checklist (RIC) which identifies the metals to be joined.

Contrary to the above, on August 12, 1982, Type 316 stainless steel components were installed and joined instead of Type 304 stainless steel components as identified by the RIC associated with Maintenance Order 82-ESS-118.

Response:

Corrective Action Taken and Results Achieved

An evaluation was performed to address the acceptability of Type 316 stainless steel vs Type 304 stainless steel for this application. The results of the evaluation indicate that Type 316 SS is an upgrade from Type 304 SS, and is therefore acceptable for this application. The welding procedure used for the installation was determined to be appropriate for both Type 316 SS and Type 304 SS since they belong to the

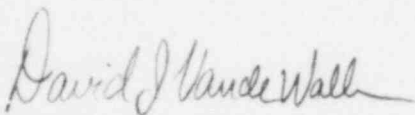
same "P" group. Nevertheless, a revised "Record of Welded Repair" (RWR) was prepared which reflects the change from Type 304 SS to Type 316 SS. The revised RWR has been included in the appropriate Maintenance Order Package.

Corrective Action To Be Taken To Avoid Further Noncompliance

Training has been provided to all Mechanical Maintenance Supervisors on the proper use of RICs and RWRs. The assigned supervisor was counseled regarding compliance to procedures and review of completed work packages.

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