



Consumers  
Power  
Company

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

May 21, 1984

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 84-05

IE Inspection Report 84-05 transmitted seven items of noncompliance which required a response by May 16, 1984. Consumers Power Company requested an extension of the due date for this response to May 21, 1984. Our response to the five items of noncompliance contained in Appendix A of the inspection report is provided herein. Consumers Power Company's response to the remaining two items of noncompliance, contained in Appendix B of the inspection report, is contained in the attachment to this letter. Consumers Power Company requests that the attachment to this letter be withheld from public disclosure since it concerns subject matter which is exempt from disclosure in accordance with 10 CFR 73.21(c).

Item 1:

Technical Specification 6.8.1.a requires implementation of procedures recommended in Appendix A of Regulatory Guide 1.33, which includes Administrative Procedures covering authorities and responsibilities for safe operation and shutdown.

Plant Administrative Procedures 4.00, "Operations Organization and Responsibilities", and 4.01, "Shift Operations", respectively, assign responsibility to the Shift Supervisor to ensure the plant is operated in accordance with Operating Procedures; and require the Shift Supervisor to advise and consult with the Duty and Call Superintendent concerning unusual operating situations, which specifically includes deviation from approved procedures.

Contrary to the above, the Shift Supervisor on January 8, 1984, placed the plant in an unusual operating situation involving total reliance for all electrical power on a single diesel generator - a condition involving

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deviation from approved Operating Procedures - but the Duty and Call Superintendent was neither advised nor consulted.

Response:

Corrective action taken and corrective action to be taken to avoid further noncompliance were previously addressed in Palisades Licensee Event Report 84-001. Full compliance has been achieved.

Item 2:

Technical Specification 6.8.1.a requires implementation of procedures recommended in Appendix A of Regulatory Guide 1.33, which includes procedures for startup, operation and shutdown of specified systems, including offsite electrical access circuits.

System Operating Procedure SOP-32, "345 KV Switchyard", which covers offsite electrical access circuits, requires at Paragraph 2.2.c that bus "R" shall not be removed from service unless station power is being supplied by diesel generators 1-1 and 1-2 or by the main and station power transformers.

Contrary to the above, on January 8, 1984, when the main transformer and diesel generator 1-2 were both unavailable to provide station power, bus R was removed from service, leaving all station power solely on diesel generator 1-1.

Response:

Corrective action taken and corrective action to be taken to avoid further noncompliance were previously addressed in Palisades Licensee Event Report 84-001. Full compliance has been achieved.

Item 3:

10 CFR 50.54(q) states in part that a licensee authorized to possess and/or operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) of this part and the requirements of Appendix E to this part. Section 6.1.1.b.2 of the Palisades Plant Site Emergency Plan states in part that, if the situation requires activation of all or part of the Site Emergency Plan, the Shift Supervisor shall: (a) Initially classify the emergency;... (d) Initiate the applicable Emergency Plan Implementing Procedures.... Section 4.1.1 of the Emergency Plan states in part that, Table 4.2 lists

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all initiating conditions and their corresponding Emergency Action Levels for classifying an Unusual Event. Table 4.2 under the heading COMMUNICATIONS LOSS states that a significant loss of offsite communication capability is classified as an Unusual Event.

10 CFR 50.72(b)(1)(v) states in part that the licensee shall notify the NRC as soon as practical and in all cases within one hour of any event that results in a major loss of communication capability.

Contrary to the above, when all offsite communications capability was lost on January 8, 1984 between 1248 and 1425 and again between 1511 and 1550, an Unusual Event was not declared and the NRC was not notified within one hour.

Response:

Corrective action taken and corrective action to be taken to avoid further noncompliance, regarding the failure to implement the Site Emergency Plan and complete the appropriate notifications to the NRC, were previously addressed in Palisades Licensee Event Report 84-001. Full compliance has been achieved.

Item 4:

10 CFR 50.54(q) states in part that a licensee authorized to operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards of 10 CFR 50.47(b) to this part and the requirements of Appendix E to this part. 10 CFR Part 50, Appendix E, Section IV.F states in part that the emergency preparedness program shall provide to the training and periodic retraining of personnel responsible for accident assessment, including control room shift personnel. Table 8.1 of the Emergency Plan states that Shift Supervisors receive periodic on-the-job and formal training as scheduled and conducted by the operator requalification training program. This program shall include a comprehensive training or a review of the Site Emergency Plan Implementing Procedures.

Contrary to the above, the Shift Supervisor on shift at the time of the loss of communications Unusual Event cited above had not received comprehensive training or a review of the Site Emergency Plan Implementing Procedures during his periodic on-the-job requalification training program and had not received any formal training in the Emergency Plan.

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Response:

The Shift Supervisor on shift at the time of the occurrence has reviewed the Site Emergency Plan Implementing Procedures. The Shift Supervisor will receive formal training in the Emergency Plan and Site Emergency Plan Implementing Procedures prior to the end of the current refueling outage. Full compliance will be achieved at that time.

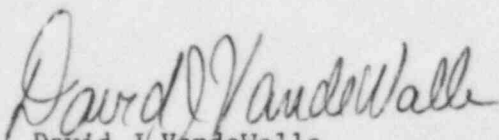
Item 5:

10 CFR 50.54(z) states in part that a utilization facility licensee shall immediately notify the NRC Operations Center of the occurrence of any event specified in Part 50.72. 10 CFR 50.72(a)(1)(i) states in part that each nuclear power reactor licensee shall notify the NRC Operations Center of the declaration of any of the Emergency Classes specified in the licensee's approved Emergency Plan. 10 CFR 50.72(a)(3) states that the licensee shall notify the NRC immediately after notification of the appropriate State or local agencies and not later than one hour after the time the licensee declares one of the emergency classes.

Contrary to the above, although the licensee declared an Unusual Event at 1600 for inoperability of diesel generators, the NRC was not informed of the emergency classification until the event was closed out at 1800 the following day.

Response:

Corrective action taken and corrective action to be taken to avoid further noncompliance, regarding the failure to implement the Site Emergency Plan and complete the appropriate notifications to the NRC, were previously addressed in Palisades Licensee Event Report 84-001. Full compliance has been achieved.

  
David J. VandeWalle  
Director, Nuclear Licensing

CC NRC Resident Inspector - Palisades

Attachment

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