



Consumers  
Power  
Company

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August 10, 1984

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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 84-09

Three items of noncompliance were identified in IE Inspection Report 50-255/84-09 dated June 29, 1984. Consumers Power Company letter of July 27, 1984 requested an extension and committed to providing the response to this inspection report by August 10, 1984. The following is our response to these items:

Noncompliance (50-255/84-09-01A)

10 CFR 50, Appendix B, Criterion V, as implemented by the Quality Assurance Program (CPC-2A) which includes a commitment to ANSI N18.7-1976, requires that activities affecting quality be prescribed by documented instructions and procedures which include appropriate qualitative and quantitative acceptance criteria and be accomplished in accordance with those instructions and procedures.

Contrary to the above, the following examples of failure to have or follow appropriate procedures were identified:

- a. No acceptance criteria, as required by ANSI N18.7-1976, paragraph 5.3, were specified in either surveillance procedure RM-45 or Wyle test procedure No 6108-545 for surveillance activities of mechanical snubber operability.

Corrective Action Taken and Results Achieved:

An operability review was performed as remedial action in response to the item. While Technical Specification Surveillance Procedure RM-45 does not contain the acceptance criteria specified in ASME Section XI, IWF-5000, it does verify that the mechanical snubbers will "lock-up" and "bleed off". Based on the existing acceptance criteria and the available test data, the mechanical snubbers are considered to be operable.

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Corrective Action to be Taken to Avoid Further Noncompliance:

Technical Specification Surveillance Procedure RM-45 will be modified by the addition of acceptance criteria which reflect the testing requirements of ASME Section XI, IWF-5000, for determining mechanical snubber operability. Additionally, the results obtained during the previous performance of surveillance procedure RM-45 will be reviewed against the newly developed acceptance criteria to confirm snubber operability.

Date When Full Compliance Will be Achieved:

Full compliance will be achieved by October 1, 1984.

Noncompliance: (50-255/84-09-01B)

10 CFR 50, Appendix B, Criterion V, as implemented by the Quality Assurance Program (CPC-2A) which includes commitment to ANSI N18.7-1976, requires that activities affecting quality be prescribed by documented instructions and procedures which include appropriate qualitative and quantitative acceptance criteria and be accomplished in accordance with those instructions and procedures.

Contrary to the above, the following examples of failure to have or follow appropriate procedures were identified:

- b. The responsible supervisor failed to sign the Acceptability Criteria and Operability Checklist indicating that safety system settings had not been violated during the performance of Surveillance Procedure #MO-3 ("Reactor Protection Matrix Logic Tests") performed in June, July and August of 1983, as required by Palisades Administrative Procedure 9.23, Paragraph 6.4.

Corrective Action Taken and Results Achieved:

The Acceptability Criteria and Operability Checklist signoff indicating that safety system settings have not been violated should have been marked as non-applicable for Surveillance Procedure MO-3, since the procedure cannot alter those settings. Consequently, no remedial action is necessary to ensure safety system settings have not been altered.

Corrective Action to be Taken to Avoid Further Noncompliance:

The item on the Acceptability Criteria and Operability Checklist, indicating that safety system settings have not been violated, will be permanently identified as non-applicable for Technical Specification Surveillance Procedure MO-3, thereby relieving the responsible supervisor from signing as such.

Date When Full Compliance Will be Achieved:

Full compliance will be achieved by October 1, 1984.

Noncompliance (50-255/84-09-08)

10 CFR 50, Appendix B, Criterion XV, as implemented by Section 15 of Consumers Power Quality Assurance Program Description for Operational Nuclear Power Plant (CPC-2A) requires measures to be established to control materials, parts or components which do not conform to requirements in order to prevent their inadvertent use or installation. Appendix A of CPC-2A states the Consumers Power Quality Assurance Program complies with Regulatory Guide 1.38, Revision 2, which endorses ANSI N45.2.2-1972, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water Cooled Nuclear Power Plants".

Contrary to the above, Consumers Power Quality Assurance Program and its implementing procedures do not require a technical justification be prepared and documented for the conditional release of a nonconforming item for installation. This documented technical justification prior to installing a nonconforming item is required by ANSI N45.2.2, paragraph 5.3.3.

Corrective Action Taken and Results Achieved:

Evaluation of current conditional material releases has been completed to verify that adequately documented technical justification exist for all applicable material and equipment.

Corrective Action to be Taken to Avoid Further Noncompliance:

Palisades Plant Administrative Procedures will be revised to address the requirement for the preparation of a documented technical justification for the conditional release of a nonconforming item for installation.

Date When Full Compliance Will be Achieved:

Full compliance will be achieved by October 1, 1984.

Noncompliance (50-255/84-09-10)

10 CFR 50, Appendix B, Criterion IV, as implemented by Section 4 of Consumers Power Quality Assurance Program Description for Operational Nuclear Power Plant (CPC-2A), requires measures to be established to assure that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are suitably included or referenced in documents for procurement.

Contrary to the above, purchase order 1004-3428-CQ, for the spare boric acid pump motor, did not specify adequate technical and quality requirements. Also include in your response to this item the procurement of safety-related items from suppliers not on the Nuclear Operations Department Approved Suppliers List.

Explanation:

The Palisades Plant Administrative Procedures allow the procurement of certain commercial quality items for use in safety related systems and components. Such procurements are known as "CQ" procurements. The CQ designation identifies the item as being 1) safety related, and 2) commercial grade. A safety related item may be procured as CQ if it meets all three of the following criteria:

- a. The item is not subject to design or specification requirements that are unique to nuclear power facilities and activities,
- b. The item is used in applications other than nuclear power facilities and activities, and
- c. The item is to be ordered from the manufacturer/supplier on the basis of specifications set forth in the manufacturer's published description (eg, a catalog, a vendor manual).

Once the determination has been made that an item is CQ, the item may be procured from a supplier who has not been evaluated and placed on the Nuclear Operations Department Approved Suppliers List (NODASL), if all of the following are true:

- a. The item is relatively simple and standard in design, manufacture and test ability,
- b. The item is adaptable to standard or automated inspections or tests of the end product to verify quality characteristics after delivery, and
- c. Receiving inspection of the item does not require operations that could adversely affect the integrity, function or cleanliness of the item.

When a CQ item is procured from a supplier who is not on the NODASL, source verification and/or receipt inspection activities provide the necessary controls.

The spare boric acid pump motor originally ordered under purchase order 1004-3428-CQ was procured as CQ. Since the vendor could not supply the exact motor which was specified, a replacement motor was substituted. During receipt inspection, a Nonconforming Material Report (NMR) was issued to address the motor substitution. The NMR required that the motor not be released for installation until appropriate documentation to address the change in design specification had been completed.

Palisades Plant Administrative Procedure 9.04 requires that changes in design specification be documented via a Specification Change (SC). The preparation of a SC requires that applicable codes, technical documents and design reference documents be researched to ensure that the design change is technically acceptable. Additionally, the SC includes a safety evaluation which addresses 10 CFR 50.59 considerations and receives technical, quality assurance and Plant Review Committee (PRC) approval. Therefore, adequate

controls were in place to address all technical and quality concerns prior to installation of the motor, despite the lack of certain specific requirements on the purchase order itself.

Corrective Action Taken and Results Achieved:

A hold tag has been placed on the spare boric acid pump motor.

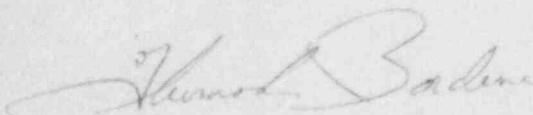
Corrective Action Taken to Avoid Further Noncompliance:

Currently, the Palisades Q-List identifies the boric acid pumps as safety related, and in a separate listing, the pump motors as safety related. Additionally, the pump is specifically designated as safety related for seismic reasons; however, the motor currently has no such designation.

The Palisades Q-List will be updated to indicate that the boric acid pump and motor are seismically qualified as a unit. This information will facilitate the incorporation of seismic requirements into future purchase orders.

Date When Full Compliance Will be Achieved:

Full compliance will be achieved by October 1, 1984



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Staff Licensing Engineer

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Director, Office of Inspection and Enforcement  
NRC Resident Inspector - Palisades