

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-255

As a result of the inspection conducted on July 16 - August 3, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violation were identified:

1. Technical Specification 6.8.1.a, by reference through Appendix A of Regulatory Guide 1.33, requires implementation of procedures for nuclear startup. Plant procedure T-95 "Initial Approach to Critical for a New Palisades Core" provides for establishment of an initial PCS boron concentration (Step 3.3) and a prerequisite (Step 3.4) stating "No dilution is occurring." Dilution is commenced at Step 5.10 after all control rods are withdrawn (Steps 5.1 through 5.6) and specified verifications are completed.

Contrary to the above, on July 24, 1984 the licensee performed three PCS dilutions which reduced the boron concentration from 1410 ppm (established at Step 3.3) to 1357 ppm, while performing procedure T-95 but before reaching Step 5.10 for commencing dilution.

This is a Severity Level IV violation (Supplement I).

2. Title 10, Code of Federal Regulations, Part 50.54(q) requires operating power reactor licensees to follow their NRC-approved emergency plans. Palisades Plant Site Emergency Plan, as approved by NRC, specifies at Paragraph 4.1.1 that incidents shall be classified as an Unusual Event with initiating conditions listed in Table 4.2. Table 4.2, in turn, lists "primary coolant system leakage in excess of Technical Specifications but less than 50 gpm" and "critical operation at PCS temperature less than 525°F" as Unusual Events.

Contrary to the above, when primary coolant system leakage exceeded Technical Specifications (1.0 gpm unidentified) on July 25 and again on July 27, the licensee delayed classification about seven hours (July 25) or did not classify (July 27) these circumstances as Unusual Events.

Also contrary to the above, with the reactor critical at PCS temperature less than 525°F at 5:44 p.m. on July 28, 1984 the licensee did not classify as an Unusual Event until 7:09 p.m.

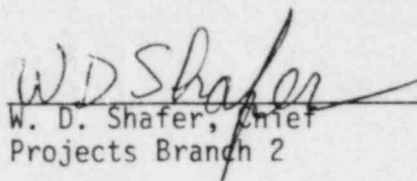
As a direct consequence, immediate (within one hour) notifications of these events to NRC and others were not completed in a timely fashion as envisioned under 10 CFR 50.72.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

AUG 22 1984

Dated _____



W. D. Shafer, Chief
Projects Branch 2