

DMB



**Consumers  
Power  
Company**

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January 10, 1985

James G Keppler, Administrator  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 - RESPONSE TO IE INSPECTION REPORT 84-25  
PALISADES PLANT

One item of noncompliance was identified in Inspection Report 50-255/84-25,  
dated December 11, 1984. The following is our response to this item:

Noncompliance (50-255/84-25-02)

10 CFR 50 Appendix B Criterion XVI "Corrective Action" states in part, "In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Consumers Power Company's Topical Report CPC-2A "Quality Assurance Program Description for Operational Nuclear Power Plants" reiterates Criterion XVI. Further, Palisades Administrative Procedure 3.03 "Corrective Action" specifies controls to assure the adequacy of corrective actions. Section 6.4 states, in part, "CARB (Corrective Action Review Board) shall review the proposed corrective action to determine if it is adequate. If the proposed corrective action is not adequate, CARB shall either amend the proposed corrective action or return the ER/DR to the evaluator for further investigation." Contrary to the above, the corrective action specified in the licensee's response to Inspection Report 255/84-14 has not precluded repetition of the violation in that on November 15 and 19, 1984 the licensee again failed to notify the U.S. NRC of unidentified primary leakage in excess of 1 gpm within one hour, as required by 10 CFR 50.72.

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### Discussion

The corrective action for IE Inspection Report 84-14 shifted the responsibilities of the Site Emergency Director from the Shift Supervisor to the Shift Engineer. This action has simplified emergency activities and facilitated the implementation of the Site Emergency Plan. Reassignment of the Site Emergency Director duties corrected the common cause of the events described in noncompliance 50-255/84-14-02.

Inspection Reports 84-25 and 84-14, in part, describe items of noncompliance resulting from the late declaration of an Unusual Event in cases of primary coolant system leakage in excess of Technical Specification limits. Operating personnel are aware of the requirement to implement the Site Emergency Plan under these conditions. However, leak rate tests can be inaccurate when plant conditions are not stable and may yield questionable values. Under these conditions, confirmatory tests are warranted with the plant in a stable condition. These uncertainties have prompted Operations personnel to delay action until an accurate measurement is obtained.

Current Technical Specifications do not allow a time period to evaluate primary coolant system leakage test results and obtain additional data. Immediate action is required that would not appear appropriate in cases where operating conditions have inserted inaccuracies in a leakage measurement. The events noted by Inspection Reports 84-25 and 84-14, in part, resulted from the attempts by personnel to accurately quantify leakage when excessive rates were indicated.

### Corrective Action Taken and Results Achieved

Evaluation of this item was performed by plant Operations, Emergency Planning, and Plant Licensing personnel. The cause was identified as a conflict between Technical Specifications requirements and the need to provide sufficient time to evaluate the accuracy of primary coolant system leak rate test results. Operations personnel have been directed to take action for excessive leak rates without further evaluation of test results. Actions will be in accordance with the current requirements of Technical Specifications and Emergency Plan Implementing Procedures.

JGKepler, Administrator  
Palisades Plant  
Response to IEIR 84-25  
January 10, 1985

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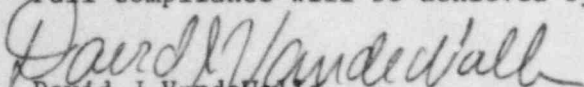
Corrective Action to be Taken to Avoid Further Noncompliance

A revision to Technical Specification 3.1.5, "Primary Coolant System Leakage Limits", will be proposed to provide a time period to evaluate excessive primary coolant system leakage and to provide additional leak rate data when needed. In addition, Emergency Plan training will be provided to Operations personnel at more frequent intervals to increase their proficiency.

Date When Full Compliance Will be Achieved

Full compliance will be achieved upon initiation of the increased training frequency on the Emergency Plan. Submittal of the proposed Technical Specifications change, while desirable, is not required to achieve full compliance.

Full compliance will be achieved by April 1985.

  
David J Vandewalle  
Director, Nuclear Licensing

CC Administrator, Region III, USNRC  
Director, Office of Nuclear Reactor Regulation  
NRC Resident Inspector - Palisades