



Consumers
Power
Company

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December 17, 1984

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Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
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DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - RESPONSE TO IE INSPECTION REPORT 84-20

Two items of noncompliance were identified in IE Inspection Report 50-255/84-20 dated November 14, 1984. Our response to these items of noncompliance follows:

Noncompliance 1 (50-255/84-20-04)

Palisades Technical Specification 4.3, "Systems Surveillance", states that the inservice testing of pumps and valves be performed in accordance with Subsections IWP and IWV of Section XI of the ASME Boiler and Pressure Vessel Code as required by 10CFR50.55a(g). Subsection IWV-3300 of Section XI of the Code states, "Valves with remote position indicators shall be observed at least once every 2 years to verify that valve operation is accurately indicated". Subsection IWV of the Code also defines required testing as that which demonstrates "that the moving parts of a valve function satisfactorily" and verifies valve "operational readiness".

Contrary to the above,

- a. The licensee failed to perform required surveillance testing in that accessible valve exercise testing was not observed locally to assure that control room indicating lights used for valve stroke timing were an accurate representation of valve operation.
- b. Limiting values for valve stroke times were selected that would not meet the intent of the Code in assuring that a valve is functioning satisfactorily or in requiring corrective action to assure valve operational readiness.

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Response to Item 1.a:

Corrective Actions Taken and Results Achieved

Surveillance procedures which are affected by the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWV-3300 have been identified.

Corrective Action to be Taken to Avoid Further Noncompliance

Applicable surveillance procedures will be modified to require a visual observation of accessible valves with remote position indicators at least once every two years to verify that remote valve indicators accurately reflect valve operation. In addition, an evaluation of the most recent performance of each applicable procedure will be performed to determine if additional valve stroke tests are needed. Any additional testing required will be performed at the next regularly scheduled performance of the applicable surveillance tests.

Date When Full Compliance Will be Achieved

The applicable surveillance procedures will be revised by June 30, 1985. Full compliance will be achieved following performance of any additional testing identified by the evaluation of prior stroke tests.

Response to Item 1.b:

Corrective Action Taken and Results Achieved

The limiting value for valve stroke time is an absolute value that indicates a component or system cannot be considered capable of meeting an intended safety function. Consequently, the limiting value of valve stroke times for power operated valves is based on the required system response times. These values are the "limiting value of full stroke time", as stated in Subsection IWV-3413.

In addition to the limiting values, administrative controls are provided that identify any significant degradation in valve stroke time. These controls ensure that corrective action is taken, when necessary, to maintain optimal valve performance.

Limiting values for valve stroke times are not to be used to indicate degraded valve performance. Changing stroke time values could create a potential for many cases of "inoperable" valves, even though the capability to perform a required safety function is available. By utilizing administrative methods that identify increased stroke times, corrective action is taken before a limit is exceeded and the added benefit of preventing unnecessary declarations of inoperable equipment is provided.

Corrective Action to be Taken to Avoid Further Noncompliance

No additional corrective action is required.

Date When Full Compliance Will be Achieved

Full compliance has been achieved.

Noncompliance 2 (50-255/84-20-03):

Criterion XII of 10CFR50, Appendix B, as implemented by Consumers Power Company "Quality Assurance Program Description for Operational Nuclear Power Plants", Section 12, requires calibrated equipment to be used in "activities affecting quality".

Contrary to the above, inservice testing procedures MO-24, SO-9, and QO-6 prescribe the use of noncalibrated stopwatches for surveillance testing. Other surveillance test procedures did not require use of calibrated stopwatches.

Corrective Action Taken and Results Achieved

Surveillance procedures that specify a time period as an acceptance criterion have been identified.

Corrective Action to be Taken to Avoid Further Noncompliance

The applicable surveillance procedures will be modified to specify that a calibrated stopwatch is required. In addition, an evaluation of the most recent performance of each applicable procedure will be performed to determine if the use of a non-calibrated stopwatch invalidated the results.

Date When Full Compliance Will be Achieved

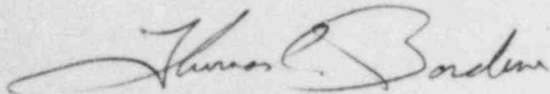
Full compliance will be achieved by February 1, 1985.

The Palisades Plant organization was recently changed to include certain capabilities that were previously performed by an offsite support group. The addition of an Inservice Inspection staff to the onsite organization will provide more comprehensive control of surveillance practices, particularly

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with respect to ASME code requirements. This change in organization is considered an action that is applicable to each of the above items of non-compliance and will be an aid to avoiding further noncompliance.



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