U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-255/85-02(DRP)

Docket No. 50-255 License No. DPR-20

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49201

Facility Name: Palisades Nuclear Generating Plant

Inspection At: Palisades Site, Covert, MI

Inspection Conducted: January 5 through February 4, 1985

Inspector: E. R. Swanson

Approved By: G. C. Wright, Chief
Reactor Projects Section 2A

2/27/85
Date

Inspection Summary

Inspection on January 5 through February 4, 1985 (Report No. 50-255/85-02(DRP))
Areas Inspected: Routine, unannounced inspection by resident inspector of action on previous inspection findings; operational safety; maintenance; surveillance; reportable events and independent inspection areas. The inspection involved a total of 79 inspector-hours onsite by one NRC inspector including 19 inspector-hours on site during off-shifts.
Results: Of the six areas inspected no items of noncompliance or deviations were found in four areas. One item of noncompliance was identified in the area of previous inspection findings (two safety injection tanks inoperable - Paragraph 2), and one item of noncompliance was identified in the area of operational safety (failure to comply with housekeeping administrative controls - Paragraph 3).

DETAILS

1. Persons Contacted

Consumers Power Company (CPCo)

*J. F. Firlit, General Manager
*J. G. Lewis, Plant Technical Director
R. D. Orosz, Engineering and Maintenance Manager
C. E. Axtell, Health Physics Superintendent
*R. M. Rice, Plant Operations Manager
C. S. Kozup, Plant Operations Superintendent
*H. M. Esch, Plant Administrative Manager
W. M. Hodge, Property Protection Supervisor
*D. W. Rogers, Technical Engineer
*D. L. Fitzgibbon, Licensing Engineer
*R. R. Frisch, Senior Licensing Analyst

*Denotes those present at the management interview.

Numerous other members of the plant Operations/Maintenance, Technical, and Chemistry Health Physics staffs, and several members of the contract Security force, were also contacted briefly.

2. Action on Previous Inspection Findings

(Closed) Unresolved Item (255/84-27-02): Two Safety Injection Tanks were below the minimum level of 186 inches allowed by Technical Specification 3.3.1(b). As discussed in IE Report 84-27, Paragraph 6.d, an Unusual Event was declared and proper operator actions were taken. The event is quite similar to a series of events during the last operating cycle related to leaking fill and drain valves and unreliable or inaccurate tank level indication. Inspector concerns related to this event include:

- Approximately 15 similar events occurred during the last operating cycle.

- Fill and drain valve (CV-3004) was repaired in 1984 but leakage was not determined as part of the operability test.

- Level instruments were known to be unreliable from the last operating cycle but no action was taken to improve them.

- Level instruments were not calibrated or checked out prior to critical operation.

- The operator knew the fill and drain valve leaked due to a previous unexpected alarm on the tank.

This event constitutes noncompliance with the Technical Specifications and, although lasting for only two minutes, is being cited in the Appendix as a violation due to the above listed concerns. Actions taken during the extended refueling outage to correct valve and indicator deficiencies were not adequate to preclude recurrence of this event (255/85-02-01).

One item of noncompliance and no deviations were identified in this area.

3. Operational Safety

The inspector observed control room activities, discussed these activities with plant operators, and reviewed various logs and other operations records throughout the inspection. Control room indicators and alarms, log sheets, turnover sheets, and equipment status boards were routinely checked against operating requirements. Pump and valve controls were verified proper for applicable plant conditions. On several occasions, the inspector observed shift turnover activities and shift briefing meetings.

Tours were conducted in the turbine and auxiliary buildings, and central alarm station to observe work activities and testing in progress and to observe plant equipment condition, cleanliness, fire safety, health physics and security measures, and adherence to procedural and regulatory requirements.

The area of housekeeping was reviewed in some detail including the Nuclear Operations Department Standards (NODS) and plant administrative procedures. It was found that the plant administrative procedures do not fully implement NODS P-13, "Housekeeping and Cleanliness Control". Section 5.1.6 of the Standard specifies that verification...shall be documented. Plant Administrative Procedure 4.04, "Plant Housekeeping", outlines specific requirements for inspection and documentation of housekeeping which have not been followed. This is an item of noncompliance as set forth in the Appendix (255/85-02-02). Subsequent to the inspection the inspector became aware of a surveillance conducted on December 15, 1984 by the licensee's QA organization which uncovered similar problems in this area; as of February 11, 1985 the licensee had not assigned responsibility for the corrective action review of the identified items.

One item of noncompliance and no deviations were identified in this area.

4. Maintenance

The inspector reviewed and/or observed selected work activities and verified appropriate procedures were in effect controlling removal from and return to service, hold points, verification testing, fire prevention/protection, and cleanliness.

The following was observed/reviewed:

a. Repair of NI-03 failed power supply (MO-85-NMS-0003)

b. Preventive Maintenance on P-90B (MO-85-DMW-998)

c. Repair of seal leakage on P-52C (procedure CCS-M-1, MO-85-CCS-0002)

No items of noncompliance or deviations were identified.

5. Surveillance

The inspector reviewed surveillance activities to ascertain compliance with scheduling requirements and to verify compliance with requirements relating to procedures, removal from and return to service, personnel qualifications, and documentation. The following test activities were inspected:

a. Cable Tray Temperature Monitoring - Test T-175

b. Daily Control Room Surveillance - Test D/WO-1

No items of noncompliance or deviations were identified.

6. Licensee Event Reports

Through direct observations, discussions with licensee personnel, and review of records, the following reportable events were examined to determine that reportability requirements were met, immediate corrective action was accomplished as appropriate, and corrective action to prevent recurrence has been accomplished per Technical Specification.

a. (Closed) LER 84-26: Inoperable Safety Injection Tanks. This event was discussed in IE Report 255/84-27(DRP), Paragraph 6.d, and is also discussed as an item of noncompliance in Paragraph 2 of this report. The licensee plans to issue a revision to correct a statement that said "...The plant remained within analyzed conditions."

7. Independent Inspection Activities

a. The inspector made observations concerning radiological safety practices in the radiation controlled areas including: verification of proper posting; accuracy and currentness of area status sheets; verification of selected Radiation Work Permit (RWP) compliance; and implementation of proper personnel survey (frisking) and contamination control (step-off pad) practices. The inspector also reviewed the containment entry while at 20% reactor power on January 12, 1985, including ALARA controls and dose records.

Health Physics logs and dose records were routinely reviewed.

b. The inspector observed physical security activities at various access control points, including proper personnel identification and search, and toured security barriers to verify maintenance of integrity. Access control activities for vehicles and packages were occasionally observed. Activities in the Central Alarm Station were observed.

c. An ongoing review of all licensee corrective action program items at the Event Report level was performed.

d. An Unusual Event (UE) was declared under the licensee's Emergency Plan on January 5, 1985 due to a loss of a preferred A.C. bus (Y-40). The D. C. breaker had tripped and supply fuses had blown. The bypass regulator was capable of supplying power while repairs were made to the inverter. It was found that two SCR's had failed and the oscillators were replaced. The UE was terminated when the alternate power supply was placed in service.

e. An Unusual Event was declared on January 23, 1985 when both channels of the Subcooled Margin Monitor were found incapable of alarming. This was determined to be due to faulty switches. The situation was quickly corrected. The plant was operating steady state at about 98% power.

f. Standing Order 37 concerning Safety Injection Tank operability was effective only during fuel cycle 5 and is still in the control room. This could provide erroneous information to the operators and result in a violation. The inspector further discussed the inappropriateness of implementing requirements of their license in documents which bypass the Plant Review Committee. The licensee agreed to review controls for standing orders and take appropriate action.

g. Two Fire Protection concerns were discussed. The first related to designation of the required shutdown Auxiliary Operator (AO) and whether it is potentially unsafe to have all AO's report to the scene of a fire. The second concern was that the fire hose stations and hose lockers observed do not have spanner wrenches available to facilitate making up hose connections. Some safety related areas require adding a hose section.

h. Although not required by their Technical Specifications, it was suggested that the licensee conduct a Shutdown Margin calculation when a control rod is inoperable. Currently one control rod is considered inoperable since the licensee chose not to exercise it on a bi-weekly basis as required by Technical Specifications. This was done to prevent further aggravation of seal leakage by moving the rod.

i. IE Report 84-27 Paragraph 6.e discussed an event involving the Saturation Margin Monitor where a condition existed which was classified as an Alert under the Emergency Plan. Contrary to what was stated in inspection report 255/84-27, the licensee does not plan to submit a

Licensee Event Report, nor have the planned actions to prevent recurrence been completed, except that both channels of subcooling margin are now displayed in the control room.

8. Management Interview

A management interview (attended as indicated in Paragraph 1) was conducted on February 11, 1985, following the inspection. The following were discussed:

a. The inspector discussed the scope and findings of the inspection as documented in these Details.

b. The item of noncompliance in Paragraph 2 relating to the two SI Tanks being operable was discussed.

c. The item of noncompliance identified in Paragraph 3 for violation of Housekeeping Administrative Controls was discussed.

d. The quality of Licensee Event Reports with respect to content, listing of previous similar events and generic corrective actions were discussed.

e. A commitment was made to review Standing Orders as discussed in Paragraph 7.f.

f. The fire protection concerns of Paragraph 7.h were discussed. The licensee agreed to put spanner wrenches at each hose station in the plant.

g. Control Rod operability issue of Paragraph 7.i was discussed. The licensee stated that they did not understand why a control rod which is considered trippable should raise concern for shutdown margin.

h. The inspector also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents/processes as proprietary.