



**Consumers  
Power  
Company**

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February 10, 1986

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

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
REONSE TO IE INSPECTION REPORT 85-031**

One item of noncompliance was identified in Inspection Report 85-031 dated January 9, 1986. The following is our response to that item:

**Noncompliance Item (50-255/85-031-01)**

Technical Specification 6.8.1.b, requires the implementation of written procedures for refueling operations. Palisades procedures; (1) FHSO-2, Revision 8, Refueling Procedure, and (2) SOP-28, Revision 6, Fuel Handling System, require that all loose hand tools, while in use over the reactor or fuel pool, shall be captured.

Contrary to the above, the licensee failed to provide and use the necessary restraining mechanism for loose tools used over the reactor and fuel pool. This resulted in a flashlight falling into the fuel pool tilt pit area.

**Corrective Actions Taken And Results Achieved**

The Operations Department ensured proper restraining devices were utilized in the reactor cavity and fuel pool area. The plant operators monitored other work groups in these areas. Subsequent tours of these areas have noted satisfactory compliance with cleanliness and tool control requirements. No further incidents of improper tool restraint have occurred.

**Corrective Action To Be Taken To Avoid Further Noncompliance**

Maintenance planners will implement controls into work orders to cause restraining devices to be utilized for maintenance activities in the vicinity of the

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fuel pool or reactor cavity area. A sign will be posted in the fuel pool area to remind all personnel of the need to control loose items over the pool. Also, a notice will be provided to all plant employees to increase the general awareness of the need to prevent foreign objects from falling in the fuel pool.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by June 1, 1986.

*Kenneth W Berry*

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Director, Nuclear Licensing

CC Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement  
NRC Resident Inspector - Palisades