

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-255/86003(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

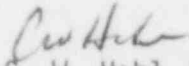
Inspection At: Covert, MI

Inspection Conducted: January 6 through 8, 1986

Inspectors: A. L. Madison

J. S. Wiebe

P. L. Hartmann

Approved By: 
C. W. Hehl, Chief
Reactor Projects Section 2A

2/12/86
Date

Inspection Summary

Inspection on January 6 through 8, 1986 (Report No. 50-255/86003(DRP))

Areas Inspected: Special, unannounced safety inspection by regional inspectors of licensee actions on previous inspection findings in the areas of maintenance and independent inspection. The inspection involved a total of 56 inspector-hours onsite by three inspectors, including eight inspector-hours onsite during off-shifts.

Results: One violation was identified (failure to maintain fire barriers functional). Also, a concern with control of chemical cleaners and lubricants within the plant was identified. Improvement in worker attitude and management's control over maintenance activities was noted.

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DETAILS

1. Persons Contacted

Consumers Power Company (CPCo)

- *J. Firlit, Plant Manager
- *J. Lewis, Technical Director
- G. Slade, Executive Director, Nuclear Assurance
- *R. McCaleb, QA Director, Palisades
- H. Esch, Plant Administrative Manager
- R. Rice, Operations Manager
- D. Joos, Planning Director
- *R. Orosz, Engineering and Maintenance Manager
- *R. Vincent, Plant Safety Administrator
- *J. Alderink, Mechanical Engineering and Maintenance Superintendent
- *P. Bruce, Electrical Superintendent
- *R. Fenech, Technical Engineer
- *B. Johnson, Licensing Engineer
- *D. Fitzgibbon, Licensing Engineer
- *R. Brzszinski, Instrument Maintenance Superintendent

The inspectors also contacted other licensee personnel, as necessary, during the performance of this inspection.

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- *E. Swanson, Senior Resident Inspector
- *C. Anderson, Resident Inspector
- *C. Hehl, Chief, Projects Section 2A
- *N. Chrissotimos, Chief, Projects Branch 2

*Denotes those attending the exit interview on January 8, 1986

2. Review of Confirmatory Action Letter 85-15 Items

a. Maintenance Order Backlog

The licensee has established a priority system to specifically address NRC requirements that the maintenance order backlog be reduced to a more manageable level and that priority be given to work according to its importance to safety and to work that can only be performed during an outage. The priority system is as follows:

Scheduling Priority Definitions

SHALL

Highest scheduling priority. Includes:

- (1) NRC commitments (including Tech Spec)
- (2) Problems that significantly increase the probability of operator error

(3) Problems that significantly increase the time required for an operator to perform a function

(4) Control Room deficiencies

These work orders shall either be completed prior to start-up or the Plant Review Committee (PRC) shall approve start-up with the problem outstanding.

HIGH SHOULD

Second highest scheduling priority.

These work orders should be completed prior to start-up. If they are not, the PRC shall determine whether the number outstanding is large enough to delay start-up.

SHOULD

Third highest scheduling priority.

These work orders should be completed prior to start-up. If they are not, the PRC shall consider them as part of the overall work order backlog in determining whether plant start-up should be delayed.

MAY

Lowest scheduling priority.

These work orders may be completed prior to start-up. If they are not, the PRC shall consider them as part of the overall work order backlog in determining whether plant start-up should be delayed.

All maintenance orders were reviewed by a subcommittee of the PRC and assigned priority status. The inspectors reviewed the open maintenance order list and the priorities established for each. The inspectors had the following comments:

- (1) Specific work items should be considered in conjunction with other work items that affect the component or system. For example, leaking feedwater check valves should be considered in light of leaking upstream isolation valves (through the seat or body to bonnet).
- (2) The cumulative effect of deficiencies on a single system should be included in the review. For example, at the time of the inspection, the Emergency Diesel Generator (EDG) 6A had approximately nine outstanding maintenance items and EDG 6B had approximately eleven. In addition, excessive load swings had been noted on one of these generators.

- (3) The effect of dessicant in the airlines to safety related air operated valves should be considered in tandem with preventing further introduction of dessicant.
- (4) The reliability of non-safety related systems should also be considered. For example, several open work items existed on the Asphalt Solidification System. Should this system become inoperable, the inability to dispose of waste products could cause a forced outage.
- (5) There appeared to be an excessive number of leaking valves ("leaking by" as well as packing, gasket and bonnet, or flange leaks). This was without considering the results of the Integrated Leak Rate Test.

During the inspection, the inspectors perceived that great emphasis was being placed on ending the outage on the scheduled date for morale as well as cost control purposes. The licensee assured the inspectors that their zeal to complete the outage on time would not interfere with safe, reliable startup and operation of the plant. The additional reviews committed to by the licensee prior to startup should ensure this; however, additional review by the NRC is recommended prior to allowing reactor startup.

b. Control Room Deficiencies

The inspectors reviewed the status of all open maintenance orders on control room deficiencies. These have all been assigned a "Shall" priority status and thus should receive adequate attention and review prior to startup. Good progress has been made in reducing the number of control room deficiencies and the licensee has set reasonable goals to achieve and maintain an adequate level. Continued review in this area by NRC is appropriate.

c. Maintenance History and Trending

The licensee has made good progress in establishing an adequate maintenance history file and should have no problem accomplishing the NRC commitments of one year history prior to startup and three years six months history file following startup. Because of inadequacies in previously used maintenance order focus, the accumulated data may be incomplete in some cases. However, the current focus will provide excellent data if used properly. Proper usage and completion of these forms will be monitored by the licensee's Quality Control and Quality Assurance Groups.

The licensee is in the process of developing a trending program to comply with NRC requirements. This program will be reviewed by the NRC prior to startup.

No violations or deviations were identified.

3. Observation of Maintenance

The inspectors observed the following maintenance activities to determine their effectiveness in reducing maintenance backlog:

- Troubleshoot and repair of various area radiation monitors
- Preventive maintenance on the plant data logging computer
- Calibration of precision test gauges
- Vital battery discharge test (service test)
- Testing, calibration, and modification of HFA relays
- Repair and calibration of various control valves
- Inspection of motor driven Auxiliary Feed pump
- Main Steam Isolation Valve repair
- Condensate Pump repair and motor installation.

The inspectors verified that activities were conducted in accordance with approved procedures and inspected as required, quality control records were maintained, approvals were obtained prior to initiating the work, activities were accomplished by qualified personnel, and fire protection requirements were met.

At the conclusion of the battery discharge (service) test, astute electrical maintenance personnel stopped the reconnection of the battery when it was determined that torquing requirements for the battery connections were not called out in the service test procedure (RE-83A, Revision 2). Considerable time and effort was expended to search for the required torque. This information should have been present in the service test procedure either as a step (preferably signed for) or as a cautionary note. The licensee agreed to revise the service test procedure. Revision of this procedure will be tracked as an Open Item (255/86003-01(DRP)).

The inspectors noted that worker attitude had improved and that the work observed was performed in a quality manner. Supervisors were found to be aware of the status of all work assigned and were frequently in the field observing work performed as were Quality Control personnel. The inspectors also noted that ALARA concerns were adequately addressed and that Radiation Protection Technicians were maintaining adequate control.

No violations or deviations were identified.

4. Plant Tours

- a. The inspectors noted that plant housekeeping had degraded, which is expected during a major outage. However, the licensee agreed to increase attention in this area and is planning to "blitz" the turbine building prior to startup. The inspectors also noted an increase in the amount of graffiti. This is also expected during a major outage with the influx of contractor personnel. However, a significant portion of the graffiti could be attributed to plant personnel. Increased management attention in this area is warranted.

- b. During tours of the Auxiliary building and Turbine building, the following doors were found blocked open with hoses or cables running through them thus further preventing their closure in the event of fire:

- (1) Auxiliary feed pump water-tight and fire door on January 8, 1986
- (2) East Safeguards room fire door on January 6, 1986

In each case, no fire watches were present nor were periodic fire patrols established to provide compensatory measures. This is a violation of Technical Specification 3.22.5 (255/86003-02(DRP)) as noted in the Appendix.

- c. Administrative Procedure 4.23, "Chemical Control", requires that all chemicals in the plant be controlled. This includes cleaning solvents and lubricants used by maintenance personnel. This procedure was established in May 1985. Additionally, the licensee conducts weekly chemical usage tours of the operating spaces. Problems continue to be experienced in controlling chemical solvents and lubricants as noted in the January 3, 1986 tour report. These problems partially stem from personnel bringing materials from home for use in the plant. However, a large amount of previously issued material that is now considered unacceptable for use still exists throughout the facility. A concerted effort by management is necessary to collect and eliminate these unwanted, potential contaminants. The timely resolution of chemical control concerns will be tracked as an Unresolved Item (255/86003-03(DRP)).

5. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involve some action on the part of the NRC or licensee or both. An Open Item disclosed during the inspection is discussed in Paragraph 3.

6. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. An Unresolved Item disclosed during the inspection is discussed in Paragraph 4c.

7. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) on January 8, 1986, and summarized the purpose, scope, and findings of the inspection. The inspectors also discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspectors during the inspection. The licensee did not identify any such documents/processes as proprietary.