



**Consumers  
Power  
Company**

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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
RESPONSE TO NRC SALP 6 REPORT

Your letter dated February 12, 1986 provided the NRC's Systematic Assessment of Licensee Performance (SALP) 6 report for the period from November 1, 1984 to October 31, 1985, and requested a written response to certain concerns raised by the SALP report. This letter provides Consumers Power Company's response to the NRC's concern in each of the following functional areas: Surveillance and Inservice Testing, Quality Programs and Administrative Control, and Emergency Preparedness.

Surveillance and Inservice Testing

The SALP rating in the area of Surveillance and Inservice Testing declined from a rating of Category 2 during the last period to a rating of Category 3 for this SALP period. The concerns raised by the SALP report were program weaknesses and a significantly worse enforcement history for the reporting period. The report, however, also noted an improving performance trend evident late in the appraisal period due to program adjustments and personnel changes in the surveillance area. A summary of these actions plus additional actions and their status is as follows:

We have reviewed the Technical Specification Section 4 surveillance requirements and have verified that each is addressed by our surveillance program.

We have initiated a review of our program implementation schedule taking into consideration the Technical Specification frequency requirements as well as the necessary plant conditions for surveillance performance. The review and all corresponding enhancements will be completed by the second quarter of 1986. The administrative controls regarding revisions to the surveillance

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program implementation schedule have been strengthened to require documentation of the reason for the revision, and Management approval. In this way, we are assured that the program implementation schedule will remain accurate.

We will improve our surveillance procedure review and revision process by ensuring that the appropriate technical personnel are assigned that responsibility. This assignment will be made by the end of the second quarter of 1986.

We have identified opportunities to improve our surveillance program administration by splitting into separate procedures those surveillance procedures which can only partially be performed in a given plant condition and require a second plant condition for completion of the remaining portion.

We have identified the need to clarify the content of the surveillance program administrative procedures. We are in the process of revising these procedures and will be completed by the end of the second quarter of 1986.

We have made the performance of required surveillance procedures more visible to all departments and Management personnel by placing them on the plant daily schedule and forced outage schedule, as appropriate.

We have upgraded the position of Surveillance Program Administrator by reassigning to a Supervisor Engineer.

We believe recent plant experience has shown that the completed initiatives have contributed to an improvement in the surveillance program and its implementation. Since October 1985, we have successfully completed 522 scheduled surveillances (exclusive of surveillance tests required for post-maintenance testing). This time period included the high activity testing periods associated with our recent refueling outage. We further believe that completion of the remaining activities we described will result in additional improvements in both the surveillance program and its implementation.

#### Quality Programs and Administrative Controls

The SALP rating in the Quality Programs and Administrative Controls areas declined from a rating of Category 2 during the previous period to a rating of Category 3 for this SALP period. Inspections indicated that the effectiveness of the corrective action program has deteriorated.

To address this concern, we are focusing our attention on the implementation of our existing Corrective Action System. Renewed emphasis will be directed toward identification of the primary cause and all contributing causes of identified problems. In so doing, personnel involved in the implementation of the Corrective Action System will be expected to approach the evaluation and resolution of each quality-related problem as an opportunity to achieve a lasting improvement at the plant, thereby facilitating a permanent reduction in the number of quality-related problems. The overall expectations regarding corrective action will be strongly communicated to applicable personnel with prompt follow-up to ensure such standards are maintained.

In addition to the renewed emphasis on the existing Corrective Action System, we made a revision in the Corrective Action System near the end of the SALP assessment period which directed significant problems to the Plant Review Committee (PRC) for concurrence with the cause evaluation and the proposed corrective actions to prevent recurrence. We intend to continue with this approach, focusing particular attention on the adequacy of the prescribed actions with respect to our goal of effecting a lasting improvement.

Furthermore, our Quality Assurance Department will be more cognizant of their overview and monitoring responsibilities for the implementation of the corrective action system. This includes emphases of their independent review of the adequacy of the cause identification during the Quality Assurance final sign-off and closeout review.

The SALP report also identified specific concerns regarding the design change process, missing or inadequate 10CFR50.59 Safety Evaluations, procedural compliance and the preparation, storage and retrieval of records. Actions being taken to address these specific concerns are as follows:

Regarding the design change process, we have completed our review of past facility changes in response to discovery of problems with a 1983 modification (SALP IV.C, Item e). Additional controls are being implemented to assure compliance with our program requirements in the future. Further controls may be implemented upon completion of a Company task group effort under way since mid-1985. In summary, we feel our design control program is frequently being reviewed and improved to assure full implementation.

As stated in the SALP report, problems with missing or inadequate 10CFR50.59 Safety Evaluations were initially addressed through training sessions aimed at personnel who may be involved in writing or reviewing the safety evaluations. The training sessions were based on our current understanding of safety evaluation requirements, as supported by information gathered through contact with other utilities and the NRC. A procedure to address 10CFR50.59 Safety Evaluations is currently under development which, when implemented, will provide supplementary guidance to personnel in the preparation and review of 10CFR50.59 Safety Evaluations. The procedure will also limit the safety evaluation review responsibilities to individuals who, by their experience, are most capable of performing a consistent and thorough review. The procedure will be implemented in the second quarter of 1986.

Procedural compliance has been emphasized within the Company for some time and forms the basis for our Quality Improvement Program started in 1980. During 1985, we recognized the need for improvement in this area and initiated staff training. This has been partially accomplished and will be completed after the plant returns to power operation. We will utilize this opportunity to reinforce the need to comply with procedures at all levels. Finally, we have established a Management Review Board to review personnel errors which will include significant procedural violations. Corrective actions identified through this board review will be focused towards reducing personnel errors and improving individual accountability including adherence to procedures.

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The records preparation, storage, and retrieval concern, stated in the SALP report, has been resolved by improvements made to the record process prior to the 1985 refueling outage. Our review of modification records generated during the 1985 refueling outage will verify the effectiveness of the improvements. Additionally, a review of plant record retention inputs will be performed to identify the correct the incomplete or duplicate record entries.

#### Emergency Preparedness

The SALP rating in the area of Emergency Preparedness was a Category 2 with the overall trend declining for this reporting period. It was noted, however, that a subsequent inspection, conducted after the end of the SALP assessment period, showed that all corrective action completion dates have been met and there are indications of improvement in emergency preparedness.

In all, 37 separate commitments and completion dates were identified to address weaknesses in the August 1985 exercise. All completion dates committed to by the Company have been or will be met. The Emergency Operations Facility has been modified to provide additional space for both NRC and Consumers Power Company personnel and additional communications equipment has been designated for NRC use. The details of these changes have been approved by appropriate NRC personnel.

A computerized tracking system for emergency plan training has been implemented. The system provides advance notice to individuals whose training may expire and status reports to those maintaining the program. The system thereby provides a more efficient method of documenting the training status of any personnel.

Strong Management attention has been given to completion of all open items within emergency planning and it should be further noted that previous SALP concerns regarding the classification of emergency conditions have been addressed this reporting period.

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