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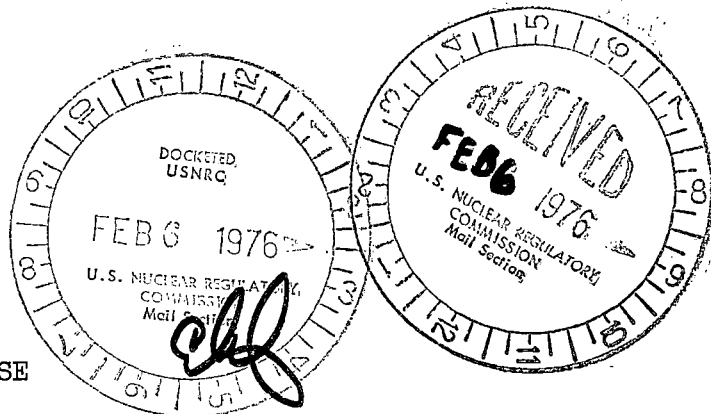
**Consumers  
Power  
Company**

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February 4, 1976

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Office of Inspection Enforcement  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255, LICENSE DPR-20 -  
PALISADES PLANT, CITATION RESPONSE



This letter is written to explain the corrective action taken with respect to apparent infractions and concerns reported in your IE Inspection Report 050-255/75-19 and transmittal letter dated January 13, 1976. These described infractions/concerns and our specific responses are discussed below.

#### Procedural Control Concerns

"Infraction B contains several examples for which procedures were not adhered to. Consequently, in your reply to this letter, you should describe in particular those actions taken or planned to improve control and implementation of plant procedures."

We have reviewed your concerns on procedural controls and offer the following response.

#### 1. Employee Training

We plan to begin an improved training program for all employees, exclusive of nuclear license training. The initial emphasis will be placed on training of first line supervisors in plant administrative affairs. During this phase we will cover the subject of procedural control requirements. This subject will also be a topic for training sessions with operators, technicians and repairmen in the future. To implement this training program, we are adding additional personnel to the training staff at the plant.

The training program will include the background and need for procedures, plant systems that exist for control of procedures and work attitudes involving use of procedures.

## 2. QA Surveillance

Audits will be conducted periodically to monitor adherence to procedures and procedural controls and provide an overview of the procedural system effectiveness. Steps will be taken, as necessary, to correct deficiencies.

## 3. Document Control

Considerable effort has been and will continue to be expended to achieve an efficient Document Control system for Palisades. We began this effort about one year ago and have significantly enlarged our plant staff associated with its implementation. As centralization and standardization of documents progress, we feel some of the past problems with procedural control will diminish. An example of this centralization is the assignment of control of "temporary procedure changes" to the Document Control area (for all departmental procedures).

As you are aware, during the past year or two we have exerted a significant amount of time and effort toward developing and improving procedures. This effort has involved literally thousands of pages of procedure revisions or procedure development and has been further complicated by changes in rules and guidelines. We hope that the need for changes will diminish such that we can devote our efforts to the concerns you have expressed.

### Quality Assurance Program Implementation Concerns

"Please provide us in your reply to this letter your revised schedule for fully implementing incompleated areas of your Quality Assurance program at Palisades."

A number of QA program areas have been identified as incompletely implemented. Certain field QA procedures will be formalized and others partially implemented will be completely implemented. The individually identified areas are discussed below.

### 1. Operations Surveillance

A QA Program Procedure for Operations Surveillance was issued in December 1975. Plant procedures will be developed during the current outage for issue and implementation by about April 1, 1976.

### 2. Deviation Reporting and Corrective Action

A temporary change to the Plant Administrative Procedures implementing major portions of the Deviation Reporting and Corrective System was issued in January 1976. An audit of the system is scheduled for February 1976. The operation of the system will then be reviewed and modified to improve its functioning. Revisions to plant procedures will be issued and fully implemented by about March 1, 1976.

### 3. QA Audit Program

Schedules for on-site and off-site QA program audits have been developed and approved for 1976. This 1976 audit program has been implemented. QA Program Procedures are in the process of being modified to include qualification and training requirements for auditors, criteria for reaudits and criteria for independency of auditors. Modified procedures will be issued by about April 1, 1976.

### 4. QA Program Policies and Procedures

Certain QA Program Policies and Procedures have been identified as inconsistent or inadequate. Modifications to the affected documents are in process. These documents will be issued and implemented by about April 1, 1976.

### 5. Training

Training deficiencies have been addressed elsewhere in this report.

#### Described Infraction A

"Contrary to Tech Specs, Section 6.4.3, Temporary Changes to procedures were not properly reviewed and approved."

In order to provide more positive control of the procedure temporary change program, the program has been revised. Features of the revised program include a centralized coordinating agency for all temporary changes, a revised form which contains instructions to inform the initiator of approval requirements, and a method to identify and remove disapproved or expired temporary changes. Personnel will receive training on the use of this program. The revised temporary change program is expected to be fully implemented by about February 15, 1976.

#### Described Infraction B

"Contrary to 10 CFR, Part 50, Appendix B, Criterion V, Plant Administrative Procedures relating to quality were not adhered to in the following instances."

1. "Completed surveillance procedures were not reviewed in a timely fashion by the responsible supervisor as specified in Administrative Procedure 6.3."

In an effort to correct this problem, we have notified the supervisors involved in this infraction and discussed their responsibility, including observing how this infraction was propagated. Future corrective action planned will involve a training session with all supervisors, charged with Technical Specifications surveillance testing responsibility, concerning their responsibility for reporting (Administrative Procedure 3.5) and their timely review of test results (Administrative Procedure 6.3). This training session will also include a discussion of how the Technical Specifications surveillance testing program is administered (Engineering Manual 09). This training session (scheduled such that it will have a minimum effect on outage work) should be completed by about March 31, 1976.

2. "Maintenance on safety-related equipment was performed per Maintenance Orders MO 75-67ESS and MO 75-84ESS without Shift Supervisor authorization as specified in Plant Administrative Procedure 5.1.26."

Maintenance Supervisors had misinterpreted Administrative Procedure 5.1.26 in that they felt they should obtain Shift Supervisor authorization only when removing equipment from service. Maintenance is done in some instances (such as Maintenance Orders referenced in audit) without equipment being removed from service and even though the Shift Supervisor was aware of the activity, the documentation was not noted on the Maintenance Order. This misinterpretation was rectified with all Maintenance Supervisors shortly after the audit and presently work on all safety-related items is authorized by the Shift Supervisor and so documented on the Maintenance Order. We conclude that this action will prevent future problems of this type.

3. "Certain documents were not controlled as specified in Plant Administrative Procedure, Chapter 10."

Most of the specific problems noted in the report details have been corrected; namely, the control errors for temporary changes issued to Radiation Protection, Operating and Maintenance procedures. All plant departments have been notified to examine existing procedures for similar problems. Future problems with control of temporary changes will be minimized by the change in practices noted in response to Infraction A above.

The problem of timely return of Records Control forms (QA-03) will be solved by a periodic notice sent to plant departments by the Document Control section. This practice will commence immediately.

Problems associated with the development of a list of effective pages for control documents and the documentation of periodic review of control documents will be resolved by a periodic notice sent to the responsible staff members by the Document Control section. We expect to be in compliance with this item by about March 30, 1976.

Complete centralization of plant documents, to the extent practicable, is the method we intend to use to achieve better control and standardization in the plant. The major exception left is the operating procedure manual which we feel already has adequate control. We are working toward full implementation to the maximum extent feasible consistent with the present outage workload. The best target date at this time is March 30, 1976. Please note that this is somewhat later than noted in the Management interview, Item 0.

4. "Quality Assurance Training has not been provided as specified in Plant Administrative Procedure, Chapter 13."

As noted in IE Inspection Report 050-255/75-19, a general indoctrination and training session in the CP Co QA program policies and operational procedures has been conducted for key supervisory personnel, but not for the general plant staff. QA indoctrination and training sessions have been scheduled for the general plant staff during February and March. Therefore, all current plant staff members should receive this training by April 1, 1976.

Full compliance with the Quality Assurance training requirements of Chapter 13 of the Administrative Procedures Manual cannot be achieved until specific operational Quality Assurance practices, requirements and operations are identified for particular job areas and the applicable training requirements are subsequently identified on the Plant Training Schedule. The Plant Training Schedule is scheduled to be completed by December 31, 1976.

Recurrence of this infraction will be prevented by the inclusion of Quality Assurance indoctrination and training on the Plant Training Schedule for all new employees. As stated above, the training schedule will be completed by December 31, 1976.

#### Described Infraction C

"Contrary to Criterion XVI of Appendix B to 10 CFR 50, deficiencies in the operation of a safety-related (charging pump) detected in April 1975 were not promptly identified and corrected."

Two steps are being taken to improve identification and correction of deficiencies noted during surveillance testing.

1. There is a new corrective action procedure being implemented which should provide plant Management with notification when safety-related maintenance is not being performed promptly.
2. The monthly and quarterly operational Technical Specifications surveillance will be assigned to a single operator and will normally be performed on a day shift to help expedite reviews. Any deficiencies will be identified in writing instead of relying on verbal communications.

The Corrective Action System will require some training and retraining of plant personnel and supervisors to be effective, so full implementation will not be assured for several months. The immediate solution which should prevent recurrence in the near future will be training of the individual day shift operator and appropriate supervisors and will be completed by March 1, 1976. The overall long-term training requires an expansion of our present training program (which is presently in the developmental stages) and cannot be assured until the end of this year.

#### Described Infraction D

"Contrary to Technical Specifications, Section 6.4.1, Administrative Procedure 4.1.2.3.1, which is used to isolate equipment for maintenance, was not adhered to for the isolation of equipment on October 29, 1975."

A meeting was held with all maintenance supervisors, maintenance and operations superintendents, and the operations supervisor in which this item of noncompliance was discussed. The importance of properly documenting the switching clearance and clearance acceptance was stressed. This meeting also reviewed the tagging procedures to identify any other areas of concern or potential violations that might exist in utilizing the procedure with no other problems being identified.

Arrangements have been made through the on-site QA/QC department to conduct two random checks (or audits) on the proper implementation of these procedures during the remaining portions of 1976. We conclude that these actions will correct this problem and that the random checks will provide additional assurance that appropriate action has been taken.



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