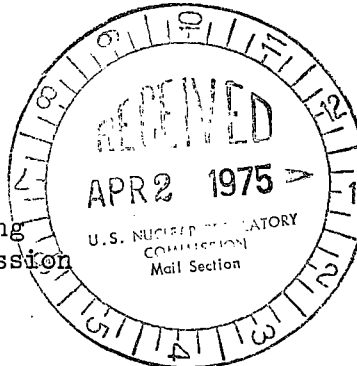


General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550



**Consumers
Power
Company**

March 31, 1975



Division of Reactor Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket 50-255
License DPR-20
Palisades Plant

Gentlemen:

The attached "Licensee Event Report" is submitted to report three events which occurred during the installation of equipment associated with postulated high-energy line-break modifications. These three incidents were classified as reportable because as a group they may indicate the lack of adequate procedures for assuring that design reviews on items having safety significance are completed.

Some difficulty was experienced in classifying these events with regard to required reportability. An audit of modifications being performed at the Palisades Plant by our Quality Assurance Department resulted in the issuance of eight nonconformance reports. Of these eight, five were classified as "NRC reportable" by the Quality Assurance Department in accordance with 10 CFR 50.55. Further review by the Operations Department and Plant Review Committee resulted in the conclusion that none were required to be reported in accordance with the operating license but that three would be reportable if the reporting definitions of Regulatory Guide 1.16, Revision 3, were in effect. 10 CFR 50.55 is not applicable after issuance of an operating license.

As three would be reportable if the reporting definition contained in Regulatory Guide 1.16, Revision 3, were incorporated into our operating license, the Plant Review Committee deemed it desirable to report these three nonconformances as a single unusual event requiring 30-day reporting.

Yours very truly,

RBS/ce

Ralph B. Sewell
Nuclear Licensing Administrator

CC: JGKepler, USNRC

3566

● LICENSEE EVENT REPORT ●

A horizontal number line with arrows at both ends. There are six major tick marks labeled 1, 2, 3, 4, 5, and 6 from left to right. There are also five minor tick marks between each pair of major tick marks, dividing each unit into six equal intervals.

(PLEASE PRINT ALL REQUIRED INFORMATION)

LICENSEE

LICENSE NUMBER

LICENSE

EVENT

1	8	9	M	I	P	A	L	1	14	15	-	-	25	4	1	1	1	0	30	0	3	31	32																
0	1	CON'T	57	58	CATEGORY	M	I	59	REPORT TYPE	L	60	REPORT SOURCE	L	61	0	5	0	-	0	2	5	5	68	69	0	2	2	8	7	5	74	75	0	3	3	1	7	5	80

EVENT DESCRIPTION

02 During modifications to systems associated with postulated high-energy line breaks out-
7 8 9 80

03 side containment, three procedural deficiencies involving review of design changes
7 8 9 80

04 and documentation were detected. At the time of these modifications the plant was
7 8 9 80

05 shut down. These items were indicative of a program deficiency rather than a specific
7 8 9 80

06 equipment deficiency. Acceptable interim measures have been taken pending permanent
7 8 9 80

PRIME

SYSTEM CODE		CAUSE CODE	COMPONENT CODE					COMPONENT SUPPLIER	COMPONENT MANUFACTURER				VIOLATION	
07	X X	D	X	X	X	X	X	X	0	X	X	X	X	Y
7	8 9 10	11	12					17	43	44			47	48

CAUSE DESCRIPTION

08	Primarily due to inadequate design change control procedures during construction	80
09	activity.	80
10		80

FACILITY STATUS		% POWER			OTHER STATUS		METHOD OF DISCOVERY		DISCOVERY DESCRIPTION	
1	1	G	0	0	0	Shutdown	b	QA Audit		
7	8	9	10	11	12	13	44	45	46	80

FORM OF ACTIVITY RELEASED		CONTENT OF RELEASE		AMOUNT OF ACTIVITY		LOCATION OF RELEASE	
1	2	Z	NA				
7	8	9	10	11		44	45
							80

PERSONNEL EXPOSURES

NUMBER				TYPE	DESCRIPTION
1	3	0	0	0	Z NA

PERSONNEL INJURIES

NUMBER				DESCRIPTION
1	4	0	0	NA

OFFSITE CONSEQUENCES

15 | None - Inadequate procedures did not result in defective equipment.

LOSS OR DAMAGE TO FACILITY

TYPE		DESCRIPTION
16	Z	NA

PUBLICITY

117 Will be released to Michigan news media on submittal to NRC. 80

ADDITIONAL FACTORS

(Event Description)(Contd) corrective action completion (UE-1-75).

19

NAME: Ralph B. Sewell

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