



**Consumers  
Power  
Company**

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

June 27, 1979

Mr James G Keppler  
Office of Inspection and Enforcement  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - IE INSPECTION REPORT 79-06

Consumers Power Company's response to the alleged discrepancies noted in IE  
Inspection Report 79-06 dated June 6, 1979 is as follows:

Item 1 - Infraction

10 CFR 20.203(c)(2) requires that high radiation areas, other than HRAs  
established for thirty days or less, be equipped with control devices which  
alarm or reduce radiation levels upon entry or be maintained locked with  
positive control over entries.

Contrary to the above, several high radiation areas, including the clean waste  
receiver tank pump room, the chronometer room, the spent resin storage tank  
room and the volume control and radwaste demineralizer rooms, were not locked  
or equipped with control devices during inspections on March 21 or March 28.  
Additionally, positive control has not been exercised over entries to these  
and other locked HRAs as exhibited by the failure to routinely follow the HRA  
access controls specified in Procedure HP 2.16 and the failure to exercise  
positive control over HRA keys.

Response

Discussion/Evaluation: 10 CFR 20.203(c)5 permits licensees to apply to the  
Commission for approval of alternate methods of controlling entry into high  
radiation areas. On October 4, 1978, the Palisades Plant On-Site Review  
Committee (PRC) reviewed and recommended for approval a proposed change to the  
Palisades Technical Specifications which would have provided an alternate  
method of controlling access to high radiation areas. This alternate method  
was similar to the method provided in the model Technical Specifications.  
Because of administrative oversights, this proposed change was not processed  
further at that time.

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In our December 8, 1978 response to items of noncompliance contained in IE Inspection Report 78-26, (1) Consumers Power Company alluded (albeit in general terms) to new methods of high radiation area entry controls in discussing the Limited Radiation Area Access (LRAA) program. As stated in the December 8, 1978 submittal, the target date for implementing the LRAA program was January 2, 1979. In attempting to satisfy the commitment to meet the January 2, 1979 deadline for implementation of the LRAA program, the revised high radiation area entry controls methods were put into effect without specific NRC approval. This departure from the requirements of 10 CFR 203(c)(2) was not willful, but rather was caused by administrative oversights as explained above.

#### Corrective Action Taken and Results Achieved

The method of controlling entry into high radiation areas has been returned to that specified by 10 CFR 20.203(c)(2).

As provided by 10 CFR 20.203, Consumers Power Company applied for (2) and received permission from the commission (3) to use an alternate method for controlling entry into high radiation areas (Palisades Plant Technical Specification Amendment No 48, dated May 15, 1979).

A letter stressing the importance of key control has been sent to all Health Physics Supervisors and Technicians and to all Shift Supervisors. This memorandum will also be reviewed during "fifth shift" training for operators.

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

Failure to exercise positive controls over high radiation area keys has been a continuing problem caused by a number of factors, among which is the condition that three separate series of locksets and keys are used throughout the plant. A new set of locks and keys to replace all existing locks and keys to high radiation area doors has been ordered. Elimination of multiple keys is expected to eliminate much of the administrative burden in key control and, thereby, enhance the key control program.

#### Date When Full Compliance Will Be Achieved

With respect to high radiation area entry controls, Palisades is in compliance with 10 CFR 20.203(c)(2). The keys and locks referred to above are expected to be on site and installed not later than September 15, 1979.

(1) D P Hoffman to J G Keppler, 12/8/78.

(2) D P Hoffman to D L Ziemann, 4/23/79.

(3) D L Ziemann to D A Bixel, 5/15/79.

## Item 2 - Infraction

Technical Specifications 6.8.1 and 6.11.1 require that certain procedures, including radiation protection and radiation instrument calibration, be implemented and adhered to.

Contrary to the above, significant discrepancies in the implementation of Procedures HP 2.1 (Daily Instrument Checks), HP 2.12 (Surveys), HP2.16 (HRA Controls), HP 2.18 (Instrument Status Board) and HP2.26 (Instrument Calibrations) were identified during this inspection.

## Response

### Corrective Action Taken and Results Achieved and Correction Action To Be Taken To Prevent Further Noncompliance

HP 2.1 (Daily Instrument Checks) - Procedures have been revised to require the use of a separate check sheet for instrument checks. Only out of specification conditions will be noted in the radiation protection log.

HP 2.12 (Surveys) - The procedures governing performance of weekly and monthly surveys are being reviewed for possible deletion. Past survey results indicate that no significant problems have been identified in areas covered by the weekly and monthly surveys.

HP 2.16 (HRA Controls) - Discrepancies and corrective action related to high radiation area controls have been discussed in Item 1 above.

HP 2.18 (Instrument Status Board) - The instrument status board has been updated to properly reflect instrument calibration status. A procedural requirement to periodically review the board will be enforced.

HP 2.26 (Instrument Calibrations) - The procedures related to instrument calibrations have been thoroughly reviewed and will be revised to ensure conformity throughout.

### Date When Full Compliance Will Be Achieved

The actions described above will be completed prior to July 31, 1979.

David P Hoffman (Signed)

David P Hoffman  
Assistant Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement