



Consumers
Power
Company

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July 6, 1981

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 - RESPONSE TO IE
INSPECTION REPORT 80-24

IE Inspection Report No. 50-255/80-24 dated June 12, 1981 detailed three (3) items of noncompliance. Our responses to two of the items are attached. As stated in the inspection report, a reply to item one (1) is not required.

David P Hoffman
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
Director, Office Of Inspection and Enforcement
Resident Inspector-Palisades

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ATTACHMENT
Consumers Power Company
Response to IE Inspection Report No 50-255, '80-24
Docket 50-255
License DPR-20

Item 2

Technical Specification 6.8.1.c requires implementation of written procedures for surveillance and testing activities of safety-related equipment.

- a. Procedure ME-12, "Battery Checks," requires in Step 5.4 that the selection of battery cells for temperature measurements be changed each month.

Contrary to that requirement, the cell selection on Battery No 1 was not changed in June, July and August 1980, and the cell selection on Battery No 2 was not changed in May and August 1980.

- b. Procedure ME-12 requires in Step 5.6 that only one battery charger per d.c. bus be in service at one time.

Contrary to that requirement, for about one hour on January 6, 1981, two chargers were erroneously connected to each d.c. bus.

- c. Procedure MC-17, "Emergency Diesel and Fuel Oil Sampling," requires in Step 5.8 that the detailed analysis sheet containing analytical results for the previous month be attached to and stored with each month's test package.

Contrary to that requirement, the previous month's analytical results were not attached to or stored with the test packages for April and October 1980.

Response to Item a

Corrective Steps Taken and Results Achieved

Because of the nature of this item, the temperature measurements for the cells in question cannot be obtained.

Corrective Steps to Prevent Further Noncompliance

The Procedure controlling this activity has been revised to more clearly state the method for determining which cells to select for temperature measurement; specifically, the location at which the cell measurement data from the previous month can be found is identified. This data, which identifies cells previously selected, permits selection of new cells for the current month's test.

Date When Full Compliance Will be Achieved

The procedure revision discussed above has been implemented.

Response to Item bCorrective Steps Taken and Results Achieved

Upon discovery (approximately one hour following misalignment), breaker alignment was restored to normal.

Corrective Steps to Prevent Further Noncompliance

The procedure governing this activity has been revised to more clearly specify the required breaker alignment when restoring battery chargers to a normal lineup. In addition, verification of correct breaker alignment by a second individual is now required.

Date When Full Compliance Will be Achieved

The corrective steps discussed above have been implemented.

Response to Item cCorrective Steps Taken and Results Achieved

The missing analysis sheets were retrieved. Analytical results met acceptance criteria. In addition, copies of MC-17 completed during 1980 and 1981 have been examined to verify that detailed analysis sheets were attached; no additional discrepancies were noted.

Corrective Steps to Prevent Further Noncompliance

Administrative procedures related to the Technical Specification surveillance program have been revised to require all blanks (eg, data entry, signature) be filled in by the person performing the test. Reviews by supervisors must verify that all blanks have been filled in.

Date When Full Compliance Will be Achieved

The procedure revisions discussed above have been implemented.

Item 3

Technical Specification 6.8.1.a requires establishment, maintenance and implementation of written procedures as recommended in Appendix A of Regulatory Guide 1.33, which includes administrative procedures for equipment locking and tagging and general plant operating procedures including turbine startup.

- a. Administrative Procedure 4.0, Appendix A, Section 2 requires in Step 3 that restoration of a locked valve to its locked position be checked by at least two operators and so documented on the switching order.

Contrary to that requirement, double verification on restoration of the locked-open suction and discharge valves for Charging Pump P-55C on January 14, 1981, was not so documented on the switching order.

- b. System Operating Procedure SOP-8, "Main Turbine Generator," requires in Step 6.1.2.2 that condenser vacuum be established to 25" Hg or more before rolling the turbine.

Contrary to that requirement, on December 11, 1980, the main turbine was rolled with a condenser vacuum of not more than 24.5" Hg.

Response to Item aCorrective Steps Taken and Results Achieved

Verification that the valves were locked open was made approximately four hours following the event.

Corrective Steps to Prevent Further Noncompliance

All operating shifts have been instructed in the requirement to perform valve position verification of normally locked valves prior to declaring the associated component operable.

Date When Full Compliance Will be Achieved

The instruction discussed above was completed on February 27, 1981.

Response to Item bCorrective Steps Taken and Results Achieved

The turbine is normally not rolled when vacuum is less than 25 inches (Hg), because that is the point at which the condenser vacuum pre-trip alarm clears. However, there is no design basis to preclude rolling the turbine at a vacuum of 23 inches (Hg) or greater. The procedure (SOP-8) has been revised to permit rolling the turbine with vacuum less than 25 inches (Hg) with Shift Supervisor approval.

Corrective Steps to Prevent Further Noncompliance

The steps discussed above are adequate to prevent further noncompliance.

Date When Full Compliance Will be Achieved

The procedure revision described above has been implemented.

CONSUMERS POWER COMPANY
Palisades Plant

IE Inspection Report 80-24
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At the request of the Commission and pursuant to the Atomic Energy Act of 1954 and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits our response to IE Inspection Report 80-24, dated June 12, 1981. Consumers Power Company response is dated July 6, 1981.

CONSUMERS POWER COMPANY

By R B DeWitt
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 6th day of July 1981.

Helen I Dempski
Helen I Dempski, Notary Public
Jackson County, Michigan
My commission expires Dec. 14, 1983