



Consumers  
Power  
Company

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February 28, 1983

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Region III  
US Nuclear Regulatory Commission  
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DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - CORRECTION OF RESPONSE TO IE INSPECTION REPORT 82-22 -  
MILK SAMPLES

NRC IE Inspection Report 82-22, dated October 28, 1982, states in part that " . . . from February 1981 until May 1982, milk was collected from only three sites". Consumers Power Company letter to the NRC dated December 1, 1982 stated that four milk samples have been taken since May 1982. A Palisades Plant QA audit of completed Technical Specification Surveillance Tests, performed in January 1982, determined that four milk samples were not collected in May 1982 and furthermore, four milk samples were not collected until October 1982. Therefore a correction to the December 1, 1982 Consumers Power Company letter and a nonroutine report as prescribed by Technical Specification 6.9.3.2 are being provided. The reason for the misunderstanding, both on the part of the NRC inspector and the Palisades Plant Chemistry/Health Physics Department personnel, is that Palisades Plant Technical Specifications Surveillance Test MR-13, which deals with sample sites only, was reviewed during the inspection. Surveillance Test MR-13 for May 1982 states that there are now four active sample sites. A review of Surveillance Test MR-31, which covers the actual sample taking, was not performed until the QA audit. Had this Surveillance Test been reviewed during the inspection, the following information would have been known.

- ° Milk samples were collected from three sites during the period from May 1981 to February 1982. The contractor responsible for collecting the milk sample was awaiting approval of a fourth dairy as a sample site.
- ° In March 1982, samples were collected from only two sites, as the cows at the third site went dry.
- ° In April 1982, samples were collected from only two sites, and, at that time, one of the sites informed our contractor that no more samples would be available since the dairy was going out of business.

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- ° The Surveillance Test (MR-13) for May listed four active sample sites, noting that a new site had been found to replace the dairy that had gone out of business in April. Nevertheless, only two samples were collected in May 1982.
- ° Only two samples were collected in June and July 1982.
- ° Three samples were collected in August 1982. These samples were not analyzed, however, because they spoiled prior to shipment to the contractor's new laboratory site in New Mexico.
- ° Only two samples were collected in September 1982 because of supply problems with the third dairy.
- ° Four milk samples were collected for the remainder of 1982, starting in October.

In addition, all of the samples that were sent in September and October and one in sample sent November did not meet sensitivity requirements because of shipment delays.

Meetings were held between the sample contractor, Palisades Plant Staff and General Office personnel in September and November 1982 and January 1983 in an effort to identify problem areas and initiate appropriate corrective action. The identified problems and corrective actions are discussed below:

1. Missing Samples - The location of the Palisades Plant in an area conducive to fruit growing has made the availability of cows for milk samples unstable. Although three dairy farms were originally sampled, two have quit the business and the other refuses to provide samples because of the emergency warning siren system being installed at their farm. Present Palisades Technical Specifications state milk samples, "when available", which resulted in a replacement not being sought unless loss of the sample was considered permanent. In that case, the contractor would request procedural authorization to change sample location; an action which was not handled expeditiously in the past.

Action

The sample contractor is now instructed to notify the appropriate Consumers Power Company contact, identify any additional milk sample sites in the area and obtain the best available replacement sample and document the location.

2. Technical Specification Interpretation - Palisades Plant Technical Specifications do not specify alternate sampling and are open to interpretation because of the use of words such as "available" and "substantially."

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#### Action

It is Consumers Power Company's intention to submit a request to change Sections 4.11 and 6.9.3.2 of the Palisades Technical Specifications to be consistent with the Standard Technical Specifications in order to avoid further misintepretations.

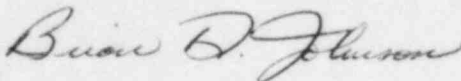
3. Transportation Delays - Due to delays in shipping samples were spoiled and also were not arriving at Eberline in time to meet sensitivity requirements.

#### Action

The spoiling problem was resolved as soon as it was brought to Consumers Power Companys attention, but AUGust samples were lost and could not be replaced in time. The Eberline contractor was instructed to ship milk as soon as the samples were collected and not to wait to accumulate full shipments. This action did not alleviate the problem, since shipments still did not arrive on time. At this point Eberline and their contractor were directed to use whatever means necessary to get the milk samples to the lab within 8 days of sampling. This action corrected the problem since February samples were air freighted and arrived on time.

#### Evaluation

The reasons for the missing 1981-82 samples are being corrected by the actions taken as described in items 1, 2 and 3 above. Management control of the program has been strengthened by redefining responsibilities between the Palisades Plant Staff and the General Office Radiological Services Department and by revising and implementing program procedures. It should also be noted that all required samples other than milk were taken as required by Technical Specifications. In addition, at least two local milk samples were analyzed during each monthly period except August 1982, when they spoiled and were not shipped. Therefore, with the samples available, excessive effluent releases from the Palisades Plant would have been detected during analysis.



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