

Consumers
Power
Company

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September 26, 1975

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


DOCKET 50-255, LICENSE DPR-20
PALISADES PLANT

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On July 21, 1975 we transmitted an Abnormal Occurrence Report (AO-75-15) which described the unavailability for service of LPSI Pump 67 B due to incorrect valve positions. Since that transmittal further discussions among our staff and telephone conversations with members of the Division of Reactor Licensing staff have lead us to conclude that additional emphasis on our corporate resolve in the areas of operations inspections and surveillance is desirable.

Topical Report CPC-1 presently covers operations inspection and surveillance in QA Program Policy 10 which requires that the plant superintendent direct the preparation of an operations surveillance program. The program requires that inspection and surveillance be performed to assure that the plant is being operated in accordance with documented procedures, the Technical Specifications, the SAR, and Quality Assurance Program requirements. The program also requires that the inspection and surveillance be performed by qualified personnel. The Plant Quality Assurance Superintendent audits to assure that plant operations inspection and surveillance activities, including start-up testing, are performed according to the program and that results are documented.

As no other departments were involved, a QA Program Procedure in Volume III was originally not considered necessary. Upon review, in light of the problem identified in AO-75-15, we have concluded that a procedure in Volume III would clarify and emphasize our corporate resolve in the area of operations inspections and surveillance. The development, review, approval and issuance of such a procedure is scheduled for completion during November 1975. The requirements of this procedure will be incorporated in plant operating procedures by early December 1975. The independent verification required in this procedure will provide assurance that valve lineups are conducted properly and also provide a mechanism for detecting systematic discrepancies.


Ralph B. Sewell
Nuclear Licensing Administrator

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