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March 12, 1984

James G Keppler, Administrator  
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 84-01

IE Inspection Report No 50-255/84-01 dated February 9, 1984 reported the results of a special safety evaluation inspection conducted during January 1984. Addressed in the report were two (2) items of non-compliance to which responses are required.

The items of non-compliance and responses thereto are given below:

Item No 1:

Technical Specification 6.2.2 states that the Plant organization shall be as shown on Figure 6.2-2, which shows the Health Physicist (Radiation Protection Manager) reporting directly to the Generating Plant Superintendent.

Contrary to the above, the Chemistry and Health Physics Superintendent (Radiation Protection Manager) has been reporting to the Operations and Maintenance Superintendent since at least December 1982.

Response To Item No 1:

During the past five years, the size of the Palisades Plant staff has increased significantly. In order to manage the increased staff effectively, several new management positions were created, including those of the Operations and Maintenance (O&M) Superintendent and the Chemistry/Health Physics Superintendent. Organizational reporting relationships were subsequently revised such that the Chemistry/Health Physics Superintendent (Radiation Protection Manager) reports to the O&M Superintendent, who in turn reports to the Plant Manager.

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In reviewing the requirement for the Health Physicist (Radiation Protection Manager) to report directly to the Plant Manager, the Plant Staff interpreted the requirement to mean the individual responsible for radiation safety (Radiation Protection Manager) should have direct access to the Plant Manager in matters of radiation safety. Consequently, a proposed Technical Specifications change was submitted in December 1982 which reflects this interpretation.

Corrective Action Taken and Results Achieved

A proposed Technical Specifications change request was submitted to the NRC on December 20, 1982 to reflect the existing Plant organization. Recent conversations with the Office of Nuclear Reactor Regulation indicate the proposed organization is acceptable and approval of the change request is imminent.

Corrective Action to be Taken to Avoid Further Noncompliance

None

Date When Full Compliance Will be Achieved

Full compliance will be achieved upon approval of the proposed Technical Specifications change.

Item No 2:

10 CFR 50.54(h) states that the licensee shall be subject to the provisions of the rules, regulations, and orders of the Commission. On March 14, 1983, the Commission issued an Order confirming the licensee's commitments on post-TMI related issues. The Order states, in part, that the licensee shall implement and maintain the specific items described as complete in the attachments to the Order. Attachment 1 to the Order lists the licensee's completion schedule date for NUREG-0737 Item II.F.1.1, "Noble Gas Effluent Monitor" as July 1, 1983. NUREG-0737 Item II.F.1.1, Clarification No. 1, requires continuous monitoring and a display which reads out in microcuries per cubic centimeter or as equivalent Xe-133 concentrations.

Contrary to the above, the licensee's noble gas effluent monitor reads out in counts per minute on the low range and mR/hr on the high range. Also, the continuous monitoring must be interrupted in order to change the particulate filter and iodine cartridge.

Response:

The Palisades Plant stack gas monitors employ a beta scintillation detector to measure noble gas encountered during normal operation. An ionization chamber is used to measure higher noble gas concentrations which would be encountered during accident conditions. The output of the beta scintillation detector is displayed in units of "counts per minute" (cpm), while the ionization chamber output is displayed in units of mR/hr. These display units are considered more accurate than  $\mu\text{Ci/cc}$  or Xe-133 equivalent concentration for the Palisades Plant monitors, because the Palisades Plant monitors are not designed to compensate for the particular mixture of noble gas radionuclides being monitored. The particular mixture will change with core burnup, the rate of release of noble gases from the core, and time after shutdown.

To properly account for the changing gas mixture, a set of curves has been developed and procedurally implemented which convert the displayed monitor response to a release rate in units of  $\mu\text{Ci/su}$ . Therefore, it is our belief that the existing Noble gas effluent monitor display, when used in conjunction with the associated curves, fully satisfies the intent of the display criterion specified in NUREG-0737, Table II.F.1.1. However, the NRC, in a letter from DMCrutchfield dated March 7, 1984, has concluded that the existing display is unacceptable and must be modified. We are evaluating possible procedure and/or equipment changes and will respond within the 30 days specified by the letter.

Information provided to the Inspector at the time of the inspection regarding continuous monitoring was inaccurate, leading to the conclusion that the required continuous monitoring capability must be interrupted to change the accident cartridge. Subsequent review of the system design indicates that the normal particulate filter and iodine cartridge, as well as the accident cartridge, may all be changed without interrupting the continuous monitoring capability of the high range noble gas monitor, as specified in Clarification 1 of NUREG-0737, Item II.F.1.1.

Corrective Action Taken and Results Achieved

- 1) A response to NRC letter dated March 7, 1984 regarding the radioactive gas effluent monitor display will be provided within 30 days.
- 2) Several misleading steps concerning system purging in the Emergency Implementing Procedure for accident conditions sampling have been corrected.

JGKepler, Administrator  
Palisades Plant  
RESPONSE TO IEIR 84-01  
March 12, 1984

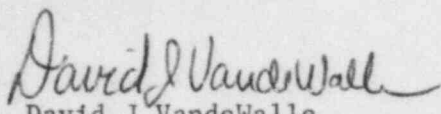
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Corrective Action to be Taken to Avoid Further Noncompliance

Personnel responsible for project implementation will be advised of this occurrence and the importance of documenting deviations from established design criteria as they are identified.

Date When Full Compliance Will be Achieved

A schedule will be provided in response to the March 7, 1984 letter from DMCrutchfield.

  
David J Vandewalle  
Director, Nuclear Licensing

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