



Consumers  
Power  
Company

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David J VandeWalle  
Director of  
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May 2, 1985

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 - REVISED RESPONSE TO INSPECTION REPORT 85-04

One item of noncompliance was identified in Inspection Report 50-255/85-04 dated February 22, 1985. Consumers Power Company response to this item was provided by our letter dated March 27, 1985. Additional action has been completed to resolve this issue. The current status is provided herein as a revised response to this item.

NonCompliance (50-255/85-04-01)

10CFR50.59 requires that a Safety Evaluation be conducted to determine if a proposed change to a system as described in the FSAR involves an unreviewed safety question.

Contrary to the above, no safety review was completed before the filter elements were removed from filters F-57A, B, and C. Removal of these filter elements resulted in the spread of resin throughout the clean radwaste system following a resin sluicing incident.

Corrective Actions Taken And Results Achieved

Filters F-57A, B and C have had filter elements reinstalled. An evaluation of the Radioactive Waste System was performed to determine if other filter elements had been removed. A similar situation was identified at two locations. A Safety Evaluation was performed for the two additional filters and determined that continued operation without filter elements would be allowed. IE Circular 80-18, "10CFR50.59 Safety Evaluations for changes to Radioactive Waste Treatment Systems", was reviewed with the appropriate Systems Engineers and Operations personnel.

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JGKepler, Administrator  
Palisades Plant  
RESPONSE TO INSPECTION REPORT 85-04  
May 2, 1985

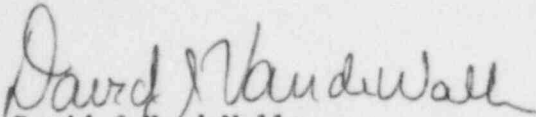
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Corrective Action To Be Taken To Avoid Further Noncompliance

The basis for prior removal of the filter elements cannot be established due to lack of documentation. It is postulated that the filters were removed for ALARA reasons due to the fine porosity of the filters which necessitated frequent replacement. The original, fine mesh filters have been temporarily reinstalled in F-57A, B and C. A larger mesh element will be provided for these filters to reduce the need for replacement, however, the elements will retain the capability to capture resin beads. The frequency of replacement will be evaluated for the larger mesh elements. Additional modifications will be provided, if required, to minimize the radiation exposure acquired during filter changes.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved. Additional actions will be completed by July 30, 1985.

  
David J VandeWalle  
Director, Nuclear Licensing

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