



**Consumers
Power
Company**

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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 -
SUPPLEMENTAL RESPONSE TO IE INSPECTION REPORT 85-017

IE Inspection Report 85-017, dated September 5, 1985, identified three violations in the area of major modifications. A response was submitted for these items of noncompliance on October 7, 1985.

The NRC response dated November 6, 1985, to our October 7, 1985 submittal indicated that one of the violations, No 255/85017-05, would be deleted and included as part of violation No 255/85017-04. It also indicated that supplemental information for the remaining violations was required. Consumers Power Company's response to the request for additional information is provided herein.

Noncompliance Item 1 (50-255/85-017-03):

10CFR50, Appendix B, Criterion XVII, as implemented by the Consumers Power Company Quality Assurance Program for Operational Nuclear Power Plants (CPC-2A), requires that quality assurance records be prepared, stored and retrieved as necessary to provide objective evidence that activities affecting quality were properly performed.

Contrary to the above, the following records providing objective evidence of satisfactory completion of Palisades Plant modifications could not be located:

- a. Control Work Package No 15618-31, Revision 0, for Facility Change Package No FC-494-3.
- b. Safety evaluation and Plant Review Committee review record for Control Work Package No 15618-31, Revision 0, for Facility Change Package No FC-494-3.
- c. Completed Construction Work Package No FC-608.

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Discussion:

The violation noted an inability to locate certain records associated with major modifications. This deficiency required improvements to be provided in the records turnover process subsequent to a major modification. These improvements were implemented prior to the inspection by personnel responsible for the administration of construction activities.

In addition to the improvements made to the records turnover process, a review will be performed to identify methods to reduce the quantity of incomplete or duplicate documents submitted to the storage system. These documents may provide misleading references that reduce the retrieval capabilities of the document control system.

We believe that all required material has been properly stored in the document control system. The necessary records can be retrieved to provide objective evidence of plant modifications. However, some additional effort may be required to locate certain records. The documents identified in the violation are typical of these materials. These documents were submitted to the records storage system prior to the institution of the additional controls on the records turnover process.

The specific records listed in the violation were located through subsequent reviews. Although excessive, the time required to locate the documents did not justify the extensive action required to improve retrievability for older documents. No benefit to plant safety would be expected from this action. However, action has been provided to improve the retrieval of all future modifications documents.

Corrective Actions Taken And Results Achieved

All documents identified by the violation have been located. Certain improvements have been implemented in the records turnover process subsequent to major modification projects. A post performance review is now required for certain types of modification records. In addition, the records generated by the General Office and in the field during construction are sorted, consolidated and indexed prior to microfilming. If possible, records associated with a specific project are filmed together, thus eliminating any dispersal to nonsequential film cartridges.

Corrective Action To Be Taken To Avoid Further Noncompliance

A review of the records retention inputs by the Plant will be performed to reduce the quantity of incomplete or duplicate documents submitted to the records storage system.

Date When Full Compliance Will Be Achieved

Full compliance will be achieved by July 15, 1986.

Noncompliance Item 2 (50-255/85-017-04):

10CFR50, Appendix B, Criterion II, as implemented by Consumers Power Company Quality Assurance Program for Operational Nuclear Power Plants (CPC-2A), requires that control be provided over activities affecting the quality of the identified structures, systems and components to an extent consistent with their importance to safety.

Contrary to the above, the design change and modification program was not properly controlled, in that the following documentation had not been completed to provide evidence that the specified work had been accomplished:

- a. Nineteen of twenty-nine signoffs were not completed on process control sheet No 7545-29, Revision 0, for Facility Change Package No FC-494-3.
- b. Ten of thirty-eight items on the Project Punch List and the Contractors Exception List for Facility Change package No FC-494-3 were not completed as required by procedure No MT-11.
- c. Three verification signatures were not completed on the work package for Facility package No FC-607.

Discussion:

The violation describes certain examples of incomplete documents associated with major modification projects. The documents did not contain the required signatures to provide evidence of satisfactory work completion. In addition, your letter of November 6, 1985, identified an additional concern to be addressed in the response to this violation. The additional concern was associated with the administration of Test Deficiency Reports resulting from modification activities.

For each example in the violation, a review of additional records or a physical inspection was performed to determine the actual status of the specific work activity. These reviews determined that the specified work was completed properly.

Our review of this evaluation has determined that the errors were limited to administrative activities. The controls provided during modifications are adequate to ensure that no deficiencies are present in plant equipment. The additional inspections and tests performed during modifications provide the necessary assurance of proper performance of the work activities. Based on this assurance and the results of our review of the NRC identified errors, further evaluations would be expected to identify administrative problems only.

The deficiencies identified by this violation have been attributed to inadequate administrative controls during major modification activities. These types of problems were previously identified by personnel responsible for the

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administration of modifications. Corrective actions were imposed to improve the documentation of these activities by the cognizant administrative personnel.

Corrective Action Taken And Results Achieved

For each deficiency identified by this violation, a review was performed to determine the status of the specified work. These reviews have established that the work occurred as prescribed, although the documentation did not provide the proper administrative evidence of this status.

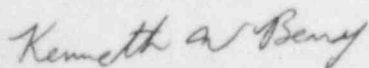
As a result of these types of deficiencies, corrective actions were implemented to improve the administration of construction work activities. Process Control Sheets failed to provide the appropriate administrative controls and their use was discontinued. Project work activities are currently documented by Construction Work Packages. These packages consolidate the work activity documentation in a single record. A completion review is prescribed by the Construction Work Package, wherein the contractor and Quality Assurance provide a post-performance review. This review will ensure the completion of all required work activities and appropriate documentation of the activities.

A procedure was developed to direct Project Punch List administration. The procedure describes Project Punch List development, distribution, filing, and individual item closure.

The current program for Test Deficiency Report administration provides several needed improvements. The initial and final conditions are required documentation. Allowance is provided to specify corrective actions to prevent recurrence of a deficiency. A Quality Assurance review and concurrence is required for a disposition concerning a repair or authorization to allow a use without repair.

Corrective Action To Be Taken To Avoid Further Noncompliance

All corrective actions are complete. No further action is required.



Kenneth W Berry
Director, Nuclear Licensing

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