October 5, 2001

Mr. Douglas E. Cooper Site Vice President Palisades Nuclear Plant Nuclear Management Company, LLC 27780 Blue Star Memorial Highway Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR GENERATING PLANT NRC INSPECTION REPORT 50-255/01-12(DRP)

Dear Mr. Cooper:

On September 29, 2001 the NRC completed an inspection at your Palisades Nuclear Generating Plant. The enclosed report documents the inspection findings which were discussed on October 3, 2001, with members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/NRC/ADAMS/index.html</u> (the Public Electronic Reading Room).

Sincerely,

### /**RA**/

Anton Vegel, Chief Branch 6 Division of Reactor Projects

Docket No. 50-255 License No. DPR-20

Enclosure: Inspection Report 50-255/01-12(DRP)

See Attached Distribution

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cc w/encl: R. Fenech, Senior Vice President, Nuclear Fossil and Hydro Operations N. Haskell, Director, Licensing and Performance Assessment R. Anderson, Chief Nuclear Officer, NMC A. Udrys, Esquire, Consumers Energy Company S. Wawro, Nuclear Asset Director, Consumers Energy Company W. Rendell, Supervisor, Covert Township Office of the Governor Michigan Department of Environmental Quality Department of Attorney General (MI) D. Cooper

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# U.S. NUCLEAR REGULATORY COMMISSION

# **REGION III**

Docket No: License No:	50-255 DPR-20
Report No:	50-255/01-12(DRP)
Licensee:	Nuclear Management Company, LLC
Facility:	Palisades Nuclear Generating Plant
Location:	27780 Blue Star Memorial Highway Covert, MI 49043-9530
Dates:	August 12 through September 29, 2001
Inspectors:	J. Lennartz, Senior Resident Inspector R. Krsek, Resident Inspector J. Maynen, Resident Inspector, D.C. Cook D. Nelson, Radiation Specialist, RIII T. Madeda, Physical Security Inspector G. Wright, Project Engineer, RIII
Approved by:	Anton Vegel, Chief Branch 6 Division of Reactor Projects

## SUMMARY OF FINDINGS

IR 05000255-01-12 on 08/12 - 09/29/2001, Nuclear Management Company, LLC, Palisades Nuclear Generating Plant.

This report covers a 7-week routine resident inspection, a baseline safeguards physical protection inspection, and a baseline radiation protection program inspection. The inspections were conducted by resident and region based specialist inspectors.

## A. Inspector Identified Findings

No findings of significance were identified.

### B. Licensee Identified Violations

No violations of significance were identified.

## Report Details

A list of documents reviewed within each inspection area is included at the end of the report.

## Summary of Plant Status

The plant was in cold shutdown (Mode 5) for the entire inspection period. The plant entered Mode 5 on June 21, 2001, because of a small leak from an axial crack on the Number 21 control rod drive mechanism pressure housing. Licensee personnel completed an extent of condition evaluation and implemented a repair plan to replace all 45 control rod drive mechanism pressure housings. The repair plan was in progress when the inspection period ended.

## 1. REACTOR SAFETY

# Cornerstones: Initiating Events, Mitigating Systems, Barrier Integrity and Emergency Preparedness

1R05 Fire Protection (71111.05Q)

a. Inspection Scope

The inspectors toured the following areas in which a fire could affect safety related equipment:

- 1D Switchgear Room (Fire Area 3);
- Emergency Diesel Generator 1-2 Room (Fire Area 6); and
- Spent Fuel Pool Cooling Room (Fire Area 17).

During the fire area tours, the inspectors verified that associated sprinkler fire suppression systems, smoke detection systems, and manual fire fighting equipment designated in the Final Safety Analysis Report (FSAR) and plant procedures were available in the areas; verified that transient combustibles and ignition sources were appropriately controlled; and, assessed the material condition of the passive fire protection features.

The inspectors reviewed documentation to verify that fire suppression and detection system surveillances had been completed as required by the licensee's fire protection program; reviewed completed evaluations of condition reports that had been entered into the licensees corrective program to assess the appropriateness of designated corrective actions; and, verified that the designated corrective actions had been implemented.

b. Findings

#### 1R12 Maintenance Rule Implementation (71111.12Q)

#### a. Inspection Scope

The inspectors reviewed the licensee's Maintenance Rule Scoping Document for the following systems designated as having high safety significance within the licensee's Maintenance Rule program:

- Service Water System;
- Switchyard System; and
- Instrument Air System.

The inspectors reviewed the goals and corrective actions for the Service Water and Instrument Air Systems which were designated as 10 CFR 50.65(a)(1) systems, and the performance criteria for the Switchyard System which was designated as 10 CFR 50.65(a)(2) system to verify appropriateness. The inspectors reviewed select condition reports that were written over the last year and the associated maintenance rule evaluations to verify that performance issues were appropriately characterized in accordance with the licensee's corrective action and maintenance rule programs.

In addition, the inspectors reviewed completed evaluations of select condition reports that were entered into licensee's corrective action program to assess the appropriateness of designated corrective actions and verified that the designated corrective actions had been implemented.

b. Findings

No findings of significance were identified.

#### 1R13 Maintenance Risk Assessments and Emergent Work Evaluation (71111.13Q)

#### a. Inspection Scope

The inspectors reviewed shutdown operation equipment check lists, Shift Supervisor logs and maintenance activity schedules to verify that the plant equipment necessary to minimize shutdown plant risk was operable and/or available as required. The inspectors conducted plant tours to verify that the necessary equipment was available for use during the following planned and emergent maintenance activities:

- Scheduled surveillance testing of fire protection pumps with Fire Pump P-9B out of service for planned maintenance in conjunction with Instrument Air Compressor C-2A emergent maintenance.
- Scheduled maintenance on Service Water Pump P-7C and main generator output breaker relay work in the switchyard in conjunction with Fire Pump P-9B out of service for planned maintenance.

The inspectors discussed the shutdown operation equipment checklists and plant configuration control for the maintenance activities with operations, maintenance and

work control center personnel to verify that necessary steps were taken to control the work activities.

In addition, the inspectors reviewed select condition reports to verify that identified problems regarding maintenance risk assessments and control of emergent work activities were appropriately characterized and entered into the licensee's corrective action program.

#### b. Findings

No findings of significance were identified.

#### 1R15 Operability Evaluations (71111.15Q)

a. Inspection Scope

The inspectors reviewed the operability assessments as documented in the associated condition reports for the following risk significant equipment:

- 1-1 Emergency Diesel Generator
- 2400 Volt Safety-Related Bus 1D

The inspectors reviewed applicable sections of the Technical Specifications (TS), Final Safety Analysis Report, Design Basis Documents (DBD), and operating and maintenance procedures to verify that the operability assessments were technically adequate and that the components remained available, such that no unrecognized increase in plant risk had occurred.

Further, the inspectors reviewed select condition reports to verify that identified problems associated with operability evaluations were appropriately characterized and entered into the licensee's corrective action program.

b. Findings

No findings of significance were identified.

#### 1R16 Operator Workarounds (71111.16)

a. Inspection Scope

The inspectors reviewed the cumulative effect of Operator Workarounds (OWAs) on equipment availability, initiating event frequency, and the ability of the operators to implement abnormal or emergency operating procedures. As part of this inspection, the inspectors interviewed the OWA Coordinator regarding the oversight and control of OWAs.

b. Findings

## 1R17 Permanent Plant Modifications (71111.17A)

#### a. Inspection Scope

The inspectors reviewed the modification that plugged two tubes in non-safety related containment air cooler, VHX-4 that had small service water leaks. The inspectors considered this modification to have risk significance in that the failure of these tubes could lead to a release path which bypassed containment or to flooding inside containment in excess of the containment flood analysis. The inspectors reviewed the licensee's engineering analysis, safety screening, and licensing basis documents.

#### b. Findings

No findings of significance were identified.

### 1R19 Post Maintenance Testing (71111.19Q)

#### a. Inspection Scope

The inspectors reviewed post maintenance testing documentation following scheduled and emergent maintenance to determine whether the tests were performed as written for the following activities:

- Scheduled preventative maintenance on 1-1 Emergency Diesel Generator;
- Emergent corrective maintenance on Charging Pump P-55A; and
- Scheduled maintenance on Instrument Air Compressors 2A and 2C.

The inspectors reviewed post maintenance testing criteria specified in the work orders to verify that the test criteria was appropriate with respect to the scope of work performed and that the acceptance criteria were clear; reviewed completed test documentation for completeness and to verify that the testing acceptance criteria was met which demonstrated the equipment's ability to perform intended safety functions.

The inspectors reviewed condition reports to verify that post maintenance testing issues were appropriately characterized and entered into the licensee's corrective action program. Completed evaluations of select condition reports that had been entered into the licensee's corrective action program were reviewed to assess the appropriateness of designated corrective actions and to verify that the designated corrective actions had been implemented.

b. Findings

## 1EP6 Drill Evaluation (71114.06)

## a. Inspection Scope

The inspectors observed an emergency preparedness training drill conducted on September 19, 2001, to verify that licensee personnel could implement the emergency plan in accordance with the prescribed implementing procedures which included evaluating the following attributes:

- the ability to classify the event accurately and within prescribed time limits;
- the ability to complete required notifications to state, local and NRC officials within prescribed time limits;
- the ability to activate the Technical Support Center within prescribed time limits and with the required number of emergency response personnel; and
- the ability to transfer command and control functions between emergency response support facilities.

The inspectors reviewed the post-drill critique to assess the licensee's evaluators ability to identify emergency plan implementation performance deficiencies; reviewed condition reports to verify that identified problems pertaining to emergency planning were appropriately characterized and entered into the licensee's corrective action program; and reviewed completed evaluations of select condition reports that had been entered into the licensee's corrective action program to assess the appropriateness of designated corrective actions and to verify that the designated corrective actions had been implemented.

b. Findings

No findings of significance were identified.

## 2. RADIATION SAFETY

## **Cornerstone: Occupational Radiation Safety**

### 2OS1 Access Controls for Radiologically Significant Areas (71121.01)

- .1 Plant Walkdowns and Radiological Boundary Verifications
- a. Inspection Scope

The inspector conducted walkdowns of the radiologically controlled area to verify the adequacy of radiological boundaries and postings. Specifically, the inspector walked down several radiologically significant work area boundaries (high and locked high radiation areas) in the Auxiliary Building and the Spent Fuel Pool.

b. Findings

## 2OS2 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls (71121.02)

## .1 Job Site Inspections and ALARA Control

## a. Inspection Scope

The inspector reviewed the ALARA planning for each of the activities associated with the removal and replacement of 45 Control Rod Drive Upper Housings. During the inspection, neither the final ALARA planning documents nor the radiation work permits had been reviewed or approved. The inspector did, however, review the draft ALARA job evaluations, exposure estimates, and exposure mitigation requirements. The inspector also evaluated the planning stage interfaces between radiation protection, maintenance, maintenance planning, scheduling, and engineering groups for interface problems or missing program elements. In addition, the inspector evaluated the proposed interfaces between radiation protection, plant management and the contractors brought on site to replace the housings, and discussed with the ALARA planners the integration of ALARA requirements into work packages.

b. Findings

No findings of significance were identified.

## 20S3 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls (71121.02)

- .1 Radiological Work Planning
- a. Inspection Scope

The inspector reviewed the exposure results for activities associated with removal of 35 out of 45 Control Rod Drive Upper Housings in order to evaluate the accuracy of exposure estimates in the ALARA plan. The inspector compared the actual exposure results versus the initial exposure estimates, the estimated and actual dose rates as well as the estimated and actual man-hours expended. The inspector also reviewed the licensee's exposure tracking system to determine whether the level of exposure tracking detail, exposure report timeliness, and exposure report distribution was sufficient to support control of collective exposures during removal of the housings. The inspector reviewed the exposure history for the project to determine if management had monitored the exposure status of the project, to determine if in-progress ALARA job reviews were needed, if additional engineering/dose controls had been established and if required corrective documents had been generated.

b. Findings

## Cornerstone: Public Radiation Safety

## 2PS3 <u>Radiological Environmental Monitoring and Radioactive Material Control Programs</u> (71122.03)

- .1 <u>Review of Environmental Monitoring Reports and Data</u>
- a. Inspection Scope

The inspector reviewed the 2000 Annual Radiological Environmental Operating Report. Sampling location commitments, monitoring and measurement frequencies, land use census, the vendor laboratory's Interlaboratory Comparison Program, and data analysis were assessed. Anomalous results including data, missed samples, inoperable, or lost equipment were evaluated. The review of the Radiological Environmental Monitoring Program (REMP) was conducted to verify that the REMP was implemented as required by the Offsite Dose Calculation Manual (ODCM) and associated Technical Specifications, and that changes, if any, did not affect the licensee's ability to monitor the impacts of radioactive effluent releases on the environment. The most recent quality assessment of the licensee's REMP vendor was reviewed to verify that the vendor laboratory performance was consistent with licensee and NRC requirements.

b. Findings

No findings of significance were identified.

- .2 Walkdowns Of Radiological Environmental Monitoring Stations and Meteorological Tower
- a. Inspection Scope

The inspector conducted a walk down of selected environmental air sampling stations and thermoluminescent dosimeters to verify that their locations were consistent with their descriptions in the ODCM, and to evaluate the equipment material condition. The meteorological monitoring site was observed to validate that sensors were adequately positioned and operable. The inspector reviewed the 2000 Annual Radiological Environmental Operating Report, to evaluate the onsite meteorological monitoring program's data recovery rates, routine calibration and maintenance activities, and non-scheduled maintenance activities. The review was conducted to verify that the meteorological instrumentation was operable, calibrated and maintained in accordance with licensee procedures. The inspector also verified that readouts of wind speed, wind direction, and atmospheric stability measurements were available in the Control Room and that the readout instrumentation was operable.

b. Findings

#### .3 <u>Review of REMP Sample Collection and Analysis</u>

#### a. Inspection Scope

The inspector accompanied the licensee REMP technician to observe the collection and preparation of air filters to verify that representative samples were being collected in accordance with procedures and the ODCM. The inspector observed the technician perform air sampler field check maintenance to verify that the air samplers were functioning in accordance with procedures. Selected air sampler calibration and maintenance records for 2001 were reviewed to verify that the equipment was being maintained as required. The environmental sample collection program was compared with the ODCM to verify that samples were representative of the licensee's release pathways. Additionally, the inspector reviewed results of the vendor laboratory's Interlaboratory Comparison Program to verify that the vendor was capable of making adequate radio-chemical measurements.

b. Findings

No findings of significance were identified.

#### .4 Unrestricted Release of Material From the Radiologically Controlled Area

a. Inspection Scope

The inspector evaluated the licensee's controls, procedure, and practices for the unrestricted release of material from radiologically controlled areas and verified that: (1) radiation monitoring instrumentation used to perform surveys for unrestricted release of materials was appropriate; (2) instrument sensitivities were consistent with NRC guidance contained in Inspection and Enforcement (IE) Circular 81-07 and Health Physics Positions in NUREG/CR-5569 for both surface contaminated and volumetrically contaminated materials; (3) criteria for survey and release conformed to NRC requirements; (4) licensee procedures were technically sound and provided clear guidance for survey methodologies; and (5) radiation protection staff adequately implemented station procedures.

b. Findings

No findings of significance were identified.

### .5 Identification and Resolution of Problems

a. Inspection Scope

The inspector reviewed condition reports, a Nuclear Performance Assessment Department audit of the Palisades Emergency Preparedness and Meteorological Monitoring Project, the Chemical and Radiological Services Department's focused self-assessment on liquid and gaseous radiological effluents, REMP and unconditional release to determine if problems were being identified and entered into the corrective action program for timely resolution. The inspector also reviewed the licensee's overall management of the REMP, including attention to details of the sampling program and the vendor laboratory, in order to evaluate the effectiveness of the REMP in collection and analysis of samples for the detection of offsite radiological contamination.

b. Findings

No findings of significance were identified.

## 3. SAFEGUARDS

## **Cornerstone: Physical Protection**

### <u>3PP4</u> Security Plan Changes (71130.04)

a. Inspection Scope

The inspector reviewed Revision 45 to the Palisades Nuclear Plant Security Plan to verify that the changes did not decrease the effectiveness of the submitted document. The referenced revision was submitted in accordance with 10 CFR 50.54(p)(2) requirements by licensee letter dated August 21, 2001.

b. Findings

No findings of significance were identified.

## 4. OTHER ACTIVITIES (OA)

## 4OA3 Event Follow-up (71153)

.1 (Closed) LER 50-255/01-001: "10 CFR 20.2201(b) Report - Loss of a Low Activity, Mixed Isotope Source." Per 10 CFR 20.2201 and 10 CFR 50.73, the licensee reported to the NRC that during an inventory of radioactive check and calibration sources at Palisades a low activity level mixed gamma source was found to be missing from its assigned cabinet. The licensee concluded after conducting an investigation that the source had inadvertently been sent to a waste disposal facility for disposal. The licensee subsequently revised the source control procedures to ensure that all sources marked for disposal are cross checked and deleted from the source inventories before they are shipped to a disposal facility. This item is closed.

## 40A6 Exit Meetings

The inspectors presented the inspection results to Mr. Dan J. Malone and other members of licensee management on October 3, 2001, after the inspection period ended. The licensee acknowledged the findings presented. No proprietary information was identified at the exit meeting. The following interim exit meetings were also conducted during the inspection period:

#### Interim Exit Meeting

Senior Official at Exit: Date: Proprietary: Subject: Change to Inspection Findings:	Mr. N. Haskell, Nuclear Oversight Manager August 30, 2001 No Radiological Environmental Monitoring Program (REMP) and Radioactive Material Control Program, As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls and Access Control to Radiologically Significant Areas No
Interim Exit Meeting	
Senior Official at Exit: Date: Proprietary: Subject: Change to Inspection Findings:	S. Cote, Security Manager August 30, 2001 No Security Plan Review No

## KEY POINTS OF CONTACT

#### Licensee

- M. P. Banks, Corrective Action Program Supervisor
- T. Brown, Manager, Chemical and Radiological Services
- D. E. Cooper, Site Vice President
- J. Fletcher, Security Manager
- B. Dotson, Licensing Analyst
- P. Harden, Director, Engineering
- N. L. Haskell, Nuclear Oversight Manager
- D. G. Malone, Acting Director, Licensing and Performance Assessment
- D. J. Malone, Plant General Manager
- G. C. Packard, Operations Superintendent
- K. Smith, Operations Manager

## <u>NRC</u>

- D. Hood, Project Manager, NRR
- J. Stang, Project Manager, NRR

# LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Opened</u>

None

<u>Closed</u>

50-255/01-001

LER

10 CFR 20.2201(b) Report - Loss of a Low Activity, Mixed Isotope Source

# **Discussed**

None

## LIST OF DOCUMENTS REVIEWED

#### <u>1R05</u> <u>Fire Protection</u>

FSAR Section 9.6	Fire Protection System	Revision 22
	Fire Hazards Analysis for Fire Areas 3, 1-D Switchgear Room; 6, 1-2 Emergency Diesel Generator; and 17, Refueling Spent Fuel Pool Area	Revision 4
	Pre-Fire Plans for Fire Areas 3, 1-D Switchgear Room; 6, 1-2 Emergency Diesel Generator; and 17, Refueling Spent Fuel Pool Area	
Completed Fi	re Protection Surveillances	
FPSP-QO-2, Attachment 2	Fire Protection Sprinkler System Water Flow Switch Alarm Check Sheet	May 18, 2001
FPSP-SI-1, Attachment 2	Data Sheet For Alarm Bells and Ionization Smoke Detectors	July 18, 2001
FPSP-RO-9, Attachment 2	Cableway Room 328 and 1D Switchgear Room 223 Sprinkler Head Locations	December 8, 2000
FPSP-RO-9, Attachement 5	Diesel Generator 1-1 Room 116 and Diesel Generator Room 1-2 Room 116B Sprinkler Head Locations	December 9, 2000
FPSP-RO-6, Attachment 2	Fire Hose Reel/Rack Station Checksheet	March 26, 2001

Condition Report Reviewed To Assess Problem Identification Characterization

CPAL0102901 Corrective Action For CPAL0100548 Not Adequately Documented

#### Condition Reports Reviewed To Assess Corrective Actions

- CPAL0100548 Fire Drill Affected by RWP (Radiation Work Permit) Administrative Issue
- CPAL0100203 Inconsistency In Fire Hazard Analysis and Placement Of Fire Extinguisher In North Heating Boiler Room

<u>1R12</u> <u>Mainte</u>	nance Rule Implementation	
	Critical Service Water Maintenance Rule Scoping Document	
FSAR Section 9.1	Service Water System	
FSAR Section 6.3	Containment Air Coolers	
FSAR Section 9.5	Instrument and Service Air	
TS 3.6.1	Containment	
TS 3.6.6	Surveillance Test, Containment Cooling Systems	
RO-216	Service Water Flow Verification	Revision 0
P&ID M-208, Sheet 1B	Service Water System	
	Switchyard Maintenance Rule Scoping Document	
	Switchyard System Health Assessment - 1st/2nd Quarter 2001	
	Switchyard System Maintenance Rule Performance Monitoring Results and Performance Indicators	
Work Orders		
24112133	CV-0869; leaks by seat > 100 gpm. Remove valve/replace seat.	
24110570	East Starting Air To K-6B Governor Check	
24110571	West Starting Air To K-6B Governor Check	
24014804	Miscellaneous Electrical System Work	
Condition Rep	ports	
CPAL012086	Containment air cooler valve will not isolate flow	
CPAL011532	T-388 (CV-0824 D/P Test) suspended due to difficulties with CV-0824 and CV-0847	
CPAL010340	Service Water System hydraulic model error	
CPAL003014	When Placing Instrument Air Compressor C-2C Inservice, Found C-2C Unloader Supply Valve MV-CA-603 Closed	

CPAL003599	Off Normal Procedure 7.1, "Loss of Instrument Air," Entered During Return to Service of M-75 Air Dryer	
CPAL010091	Compressor C-2A Failed to Load After Repairs to C-2C	
Condition Rep	ports Reviewed To Assess Corrective Actions	
CPAL0100722	Switchyard 125 VDC/240 VAC Trouble Alarm	
CPAL0100902	Thermal Scan Found Hot Spot On Disconnect 29R4	
CPAL0003284	Critical Service Water System Exceeds Maintenance Rule Performance Criteria	
CPAL0100365	Start Time Acceptance Criteria Not Met For 1-2 EDG Using 1 Air Start Motor	
<u>1R13</u> <u>Mainte</u>	nance Risk Assessments and Emergent Work Evalu	uation
	Shift Supervisor log entries September 9 through 15, and September 21 through 27, 2001	
GOP-14, Attachment 15	Shutdown Operation Protected Train Equipment List in effect September 9 through 15, 2001	Revision 13
GOP-14, Attachment 16	Shutdown Operation Equipment Sheets in effect September 9 through 15, September 21 through 26, and September 26 through 28, 2001	Revision 13
GOP-14, Attachment 3	Shutdown Cooling Equipment Availability in effect September 21 through 26, and September 26 through 28, 2001	Revisions 33 and 34
Condition Rep	ports Reviewed To Assess Problem Identification Ch	aracterization
CPAL0102928	Instrument Air Compressor C-2A Removed From Service Prior To Making C-2C Operable	
CPAL0103068	Service Water Pump 7C Return To Service Delayed Due To Mechanical Work Package	
CPAL0103141	GOP-14 Shutdown Cooling Equipment Availability Sheet did Not Reflect Actual Power Supply Alignment For 1C and 1D 2400 Volt Busses	

<u>1R15</u> Opera	bility Evaluations		
FSAR Section 8.4	Emergency Power Sources		
TS 3.8.1	AC Sources - Operating		
EA-ELEC-LD TAB.005	Engineering Analysis, Emergency Diesel Generators 1-1 and 1-2 Steady State Loading	Revision 5	
MO-7A-1	Surveillance Test, Emergency Diesel Generator 1-1 (K-6A)	Revision 54	
MO-7A-1&2	Surveillance Test, Emergency Diesel Generators 1-1 & 1-2	Revision 7	
DBD 5.03	Emergency Diesel Generator Criteria	Revision 5	
CPAL012683	Condition Report - Emergency Diesel Generator 1-1 could not reach acceptance criteria of 2705 kW during peak load test		
FSAR Section 8.6	Automatic Transfer, Voltage Protection and Load Shedding Controls	Revision 21	
FSAR Section 8.3.2	2400 Volt System	Revision 21	
CPAL0103069	Condition Report - Bus 1D Voltage Below 2300 Volts For Four Minutes		
ESOGR Item 75	Voltage Restrictions In Mode 5 and 6		
Condition Re	ports Reviewed To Assess Problem Identification Cl	naracterization	
CPAL012696	Current DBA kW load values for Diesel Generator 1-1 and 1-2 are not reflected in the DBD		
CPAL0103041	Incorrect Operability Determinations		
<u>1R16</u> Opera	itor Workarounds		
Emergency C	Operating Procedures		
EOP-1	Standard Post Trip Actions	Revision 10	
EOP-4	Loss of Coolant Recovery	Revision 12	
Supplement 42	Jumpering CHP For One Containment Spray Valve	Revision 0	

EOP-5	Steam Generator Tube Rupture Recovery	Revision 12	
EOP-9	Functional Recovery Procedure	Revision 13	
Supplement 6	Checksheet For Containment Isolation and CCW Restoration	Revision 7	
<u>Off Normal C</u>	perating Procedures		
ONP-6.2	Loss of Component Cooling Water	Revision 8	
ONP-23.1	Primary Coolant Leak	Revision 19	
Condition Re	<u>ports</u>		
CPAL0100025	Traveling screen high differential pressure alarm design change being developed to reduce/eliminate frazil ice in bubbler tubes		
CPAL0100243	Unexpected transfer of spent fuel pool inventory to SIRW		
CPAL0100382	Primary information processor (PIP) did not return to service when reset		
CPAL0100545	Intake bay ice results in traveling screen f-4c failure and entering of ONP 6.1 "Loss of Service Water"		
Other Docum	ients		
Palisades Nuclear Procedure Action Plan #2210-009	Operator Work Around Program	Revision 0, Dated 2/8/01	
Administrative Procedure 4.12	Operator Work Around Program Revision 0		
	Operator Work Around Check Sheet		
1R17 Permanent Pla	ant Modifications		
FSAR Section 6.3	Containment Air Coolers		
TS 3.6.1	Containment		
TS 3.6.6	Containment Cooling Systems		
EAR-2001-0367	Engineering Action Request - Permanent Plugs for Containment Air Cooler VHX-4		

P&ID M-208-1B	Service Water System
Work Orders	
24111857	VHX-4; tube leak and cooling coil repair. TM-2001-010.
24111944	VHX-4; remove TM-2001-010 and perform permanent repairs
24111971	VHX-4; apply epoxy to repair leak. TM- 2001-011

# <u>1R19</u> Post Maintenance Testing

# Work Orders

24014737	K-6A, upgrade M series heads with ALCO 251 Plus heads	August 12, 2001
24014834	K-6A, replace rocker bushings on all 18 cylinders	August 12, 2001
24111376	K-6A starting air instrumentation calibration	August 10, 2001
24112722	1-1 EDG, install new starting air PCV	August 12, 2001
24014409	C-3A air compressor maintenance	August 12, 2001
24014256	K-6A, pump timing, valve adjustment, hose replacement	August 12, 2001
24111996	Charging Pump P-55A, leak from fluid drive cooler reversing endbell	August 19, 2001
24119924	Instrument Air Compressor 2A Overhaul and Flush	September 28, 2001
24014530	Instrument Air Compressor 2A and 2C, Resolve Rusty Loader Valves Per EAR-2000-0559	September 20, 2001
24111001	Instrument Air Compressor 2C Overhaul and Flush	September 28, 2001

# Other Documents

- FSAR Section 8.4 Emergency Power Sources
- TS 3.8.1 AC Sources Operating

MO-7A-1	Surveillance Test - Emergency Diesel Generator 1-1 (K-6A)	Revision 54
MO-7A-1&2	Surveillance Test - Emergency Diesel Generators 1- 1 & 1-2	Revision 7
EPS-M-14	Diesel Generator 1-1 - Refueling Frequency Maintenance	Revision 1
	Consumers Energy Memorandum, Periodic review of VT-2 Examiner Certifications	July 19, 2001
EM-09-14, Attachment 1	VT-2 Examination Checklist, Work Order 24111996	August 19, 2001
Procedure 5.19, Attachment 2	Guidelines For Post Maintenance Testing Electrical Maintenance	Revision 9
WI-CAS-M-04	Work Instructions For Maintenance of Plant Air Dryer M-2	Revision 1
Work Order 24014129	M-2 Annual Inspection	May 25, 2001
Procedure RO-97	Auxiliary Feedwater System Automatic Initiation Test Procedure	Revision 10
EA-GEJ-96-06	Engineering Analysis, Minimum Auxiliary Feed Requirement For All Auxiliary Feed Pumps	Revision 0
Condition Re	ports Reviewed To Assess Problem Identification Chara	<u>cterization</u>
CPAL012643	Rocker Arm on 1-1 EDG Found Slightly Peened at the Bushing Area	
CPAL0102974	Wrong Solenoid Valve Determinated For Work On Instrument Air Compressor C-2A	
CPAL0102826	Weaknesses in Condition Report Evaluations and Corrective Actions	
Condition Re	ports Reviewed To Assess Corrective Actions	
CPAL0000583	Inadequate Post Maintenance Testing Performed on CRD-12	
CPAL0000876	Incomplete Post Maintenance Testing Per WI-CAS- M-04	
CPAL0002531	No Steps In Procedure To Mechanically Start Fire Pump P-9B Driver K-5	

CPAL0001378	Post Maintenance PMT Inadequate
CPAL9901345	Incorrect Post Maintenance Testing Specified on PPAC FWS-138

## 1EP6 Drill Evaluation

# Emergency Plan Implementing Procedures

EI-4.1	Technical Support Center Activation	Revision 13
EI-1	Emergency Classification and Actions	Revision 36
EI-3	Communications and Notifications	Revision 18
EI-3, Attachment 1	Emergency Notification Form	Revision 18
EI-1, Attachment 2	Emergency Actions/Notifications	Revision 36

## Condition Reports Reviewed To Assess Problem Identification Characterization

CPAL0103027	Emergency Preparedness Training Areas Needing Improvement				
CPAL0102995	Palisades Public Warning System Siren Failures September 8, 2001				
CPAL0103061	Emergency Classification Anomaly During PALEX2001 Not Reflected In Exercise Scenario				
CPAL0103052	Incorrect Egress From TSC During PALEX2001 Exercise				
CPAL0103062	Emergency Siren and PA Not Heard In DFS Building				
CPAL0103058	Errors/Omissions On Notification Forms During PALEX2001				
Condition Report Reviewed To Assess Corrective Actions					
CPAL0001507	Quality of Notification Forms Generated During the May 9 Practice Exercise				
20S2 As-Low-As-Is-Reasonably-Achievable (ALARA) Planning and Controls					
CPAL0103065	RWP P011033 as exceeded the Rev. 0 dose estimate by more than 50 percent (i.e., 88 percent)	September 9, 2001			

HP 11.1 Processing radiation work permits and ALARA reviews Revision 13

			September 27, 2001			
Control F	Rods and Drive Mechanisms		Revision 13			
		sing	September 27, 2001			
Daily Act	ivity on One RWP (01-1033)		September 27, 2001			
<u>2PS3</u> <u>Radiological Environmental Monitoring and Radioactive Material Control</u> <u>Programs</u>						
	Palisades Emergency Preparedness and Meteorological Monitoring Project Audit	Augu	st 18, 2000			
	Self-Assessment on Liquid and Gaseous Radiological Effluents, REMP and Unconditional Release	June	8, 2001			
	Several Procedure Deficiencies Noted During Annual Audit of REMP/RETS	Octol	oer 10, 2000			
	Environmental Air Station Location	August 8, 2001				
	Engineering Analysis - Plant Radionuclide Mixture and Calibration Sources	March 10, 1999				
	Offsite Dose Calculation Manual	Revis	sion 15			
SR-	Nuclear Utilities Procurement Issues Committee Audit Report - Environmental Incorporated	June 27, 2001				
	2000 Annual Radiological Environmental Operating Report	April	30, 2001			
ocedure	Contamination Control	Revision 8				
	Palisades Radiological Environmental Program Sample Collection and Shipment	Revis	sion 5			
onitoring 150	Calibrations	June 8, 1998				
	10 Meter Wind Speed 1 A	June 19, 2001				
	10 Motor Wind Direction 1 A	June 19, 2001				
	10 Meter Wind Direction 1 A	June	19, 2001			
	Number of Control F Phase II from Rea Daily Act ological E rams	from Reactor Head Daily Activity on One RWP (01-1033) ological Environmental Monitoring and Radioactive Mat rams Palisades Emergency Preparedness and Meteorological Monitoring Project Audit Self-Assessment on Liquid and Gaseous Radiological Effluents, REMP and Unconditional Release Several Procedure Deficiencies Noted During Annual Audit of REMP/RETS Environmental Air Station Location Engineering Analysis - Plant Radionuclide Mixture and Calibration Sources Offsite Dose Calculation Manual SR- Nuclear Utilities Procurement Issues Committee Audit Report - Environmental Incorporated 2000 Annual Radiological Environmental Operating Report ocedure Contamination Control Palisades Radiological Environmental Program Sample Collection and Shipment for Calibrations 10 Meter Wind Speed 1 A	Number 01-1033   Control Rods and Drive Mechanisms   Phase II CRD Project Timeline - Remove 35 CRD Housing from Reactor Head   Daily Activity on One RWP (01-1033)   ological Environmental Monitoring and Radioactive Material Crams   Palisades Emergency Preparedness and Meteorological Monitoring Project Audit   Self-Assessment on Liquid and Gaseous Radiological Effluents, REMP and Unconditional Release   Several Procedure Deficiencies Noted During Annual Audit of REMP/RETS   Environmental Air Station Location   Augu   Mixture and Calibration Sources   Offsite Dose Calculation Manual   SR-   Nuclear Utilities Procurement Issues Committee Audit Report - Environmental Incorporated   2000 Annual Radiological Environmental Incorporated   2000 Annual Radiological Environmental Program Sample Collection and Shipment   Program Sample Collection and Shipment			

WS-1 Calibration	10 Meter Wind Speed 1 B	June 20, 2001
WD-1 Calibration	10 Meter Wind Direction 1 B	June 20, 2001
WD-2 Calibration	10 Meter Wind Direction 2 B	June 20, 2001
WS-1 Calibration	60 Meter Wind Speed 1	June 21, 2001
WD-1 Calibration	60 Meter Wind Direction 1	June 21, 2001
WD-2 Calibration	60 Meter Wind Direction 2	June 21, 2001
Temperature Calibration	Temperature Delta T	June 19, 2001
3039506	Air Monitor Calibration	March 14, 2001
PAL-1	Air Monitor Calibration	January 11, 2001
PAL-5	Air Monitor Calibration	January 11, 2001
PAL-6	Air Monitor Calibration	May 1, 2001
PAL-7	Air Monitor Calibration	May 1, 2001
<u>3PP4</u> <u>Security Plan</u>	Changes	
Revision 45 Palisade	s Security Plan	August 20, 2001