June 10, 2004

Mr. Daniel J. Malone
Site Vice President
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES NUCLEAR PLANT
NRC INSPECTION REPORT 05000255/2004008(DRS)

Dear Mr. Malone:

On April 12, 2004, the U. S. Nuclear Regulatory Commission (NRC) completed a baseline inspection at your Palisades Nuclear Plant. The enclosed report documents the inspection findings which were discussed on May 20, 2004, 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. Within these areas, the inspection consisted of a review of selected examinations, procedures, and representative records, observation of licensed operator examination activities, and interviews with personnel.

Based on the results of this inspection, we identified one issue of very low safety significance (Green) that was determined to be a violation of NRC requirements. However, because of its very low safety significance and because the issue was entered into your corrective action program with appropriate compensatory actions, the NRC is treating this issue as a Non-Cited Violation in accordance with Section VI.A.1 of the NRC's Enforcement Policy.

If you deny this Non-Cited Violation, you should provide a response with a basis for your denial, within 30 days of the date of this inspection report, to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U. S. Nuclear Regulatory Commission - Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Palisades facility.

In accordance with 10 CFR 2.390 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 **http://www.nrc.gov/reading-rm/adams.html** (the Public Electronic Reading Room).

Sincerely,

/RA/

Roger D. Lanksbury, Chief
Operations Branch
Division of Reactor Safety

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

Enclosure: Inspection Report 05000255/2004008(DRS)
w/attachment: Supplemental Information

cc w/encl: J. Cowan, Executive Vice President
and Chief Nuclear Officer
R. Fenech, Senior Vice President, Nuclear
Fossil and Hydro Operations
D. Cooper, Senior Vice President - Group Operations
Manager, Regulatory Affairs
J. Rogoff, Vice President, Counsel and Secretary
A. Udrys, Esquire, Consumers Energy Company
Director of Nuclear Assets, Consumers Energy Company
Supervisor, Covert Township
Office of the Governor
Michigan Department of Environmental Quality -
Waste and Hazardous Materials Division
Michigan Department of Attorney General

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-255
License No:	DPR-20
Report No:	05000255/2004008(DRS)
Licensee:	Nuclear Management Company, LLC
Facility:	Palisades Nuclear Plant
Location:	27780 Blue Star Memorial Highway Covert, MI 49043-9530
Dates:	March 18 through April 12, 2004
Inspectors:	D. McNeil, Reactor Engineer (Lead Inspector) N. Valos, Reactor Engineer
Approved by:	R. Lanksbury, Chief Operations Branch Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000255/2004008(DRS); 03/22/2004 - 03/26/2004 (on-site) and 03/18/2004 - 04/12/2004 (periodic in-office review); Palisades Nuclear Plant; Licensed Operator Requalification Program.

This report covers an approximate one-month period of on-site and in-office reviews in the area of licensed operator requalification training and examination. This was an announced, baseline inspection conducted by two regional specialist inspectors. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, “Significance Determination Process” (SDP). Findings for which the SDP does not apply may be “Green” or be assigned a severity level after U.S. Nuclear Regulatory Commission management review. The U.S. Nuclear Regulatory Commission’s program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, “Reactor Oversight Process,” Revision 3, dated July 2000.

A. Inspector-Identified Findings

Cornerstone: Reactor Safety/Mitigating Systems

- Green. The inspectors identified that the licensee was not completing the requirements of 10 CFR 55.53(f) prior to allowing inactive licensed operators to resume control room watchstanding duties. Because the Shift Engineer position did not meet the definition of "*actively performing the functions of an operator or senior operator*" per 10 CFR 55.4, "Definitions," operators inappropriately received credit for license proficiency when standing this watch station. For licensees that stood this watch station exclusively, their licenses became inactive at the end of the next calendar quarter. When these licensees subsequently stood Shift Manager or Control Room Supervisor watches prior to completing the requirements of 10 CFR 55.53(f), a violation of 10 CFR 55.53(e) requirements occurred.

  The finding was more than minor because the failure to satisfy license proficiency requirement increased the likelihood of an operator error involving systems used to mitigate an event. The SDP Appendix I flowchart focused on general record deficiencies exceeding a specified threshold of 20 percent of the records reviewed. The sample review of 27 operators revealed that 7 operators had inactive senior operator licenses (26 percent). The inspectors determined from the SDP that this finding was of very low safety significance. (Section 1R11.7.b)

B. Licensee-Identified Violations

None.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Mitigating Systems

1R11 Licensed Operator Requalification (71111.11)

.1 Facility Operating History

a. Inspection Scope

The inspectors reviewed the plant's operating history from January 2002 through March 2004 to assess whether the Licensed Operator Requalification Training (LORT) program had identified and addressed operator performance deficiencies at the plant.

b. Findings

No findings of significance were identified.

.2 Licensee Requalification Examinations

a. Inspection Scope

The inspectors performed a biennial inspection of the licensee's LORT program. The inspectors reviewed the annual requalification operating test and biennial written examination material to evaluate general quality, construction, and difficulty level. The operating examination material reviewed consisted of four operating tests, each containing three dynamic simulator scenarios and five job performance measures (JPMs). The annual operating tests were conducted in February and March 2004. The four biennial written examinations reviewed were administered during calendar year 2003. Each examination consisted of approximately 30 open-reference, multiple choice questions and two questions involving calculations. The inspectors reviewed the methodology for developing the examinations, including the LORT program two-year sample plan, probabilistic risk assessment insights, previously identified operator performance deficiencies, and plant modifications. The inspectors also reviewed the licensee's program and assessed the level of examination material duplication during the current year annual examinations as compared to the previous year's annual examinations.

b. Findings

No findings of significance were identified.

.3 Licensee Administration of Requalification Examinations

a. Inspection Scope

The inspectors observed the administration of the requalification operating tests to assess the licensee's effectiveness in conducting the tests and to assess the facility evaluators' ability to determine adequate performance using objective, measurable performance standards. The inspectors evaluated the performance of one shift crew and several day-staff licensees in parallel with the facility evaluators during four dynamic simulator scenarios. In addition, the inspectors observed licensee evaluators administer several JPMs to various licensed individuals. The inspectors observed the training staff personnel administer the operating test, including pre-examination briefings, observations of operator performance, and individual and crew evaluations after dynamic scenarios. The inspectors evaluated the ability of the simulator to support the examinations. A specific evaluation of simulator performance was conducted and documented under Section 1R11.7, "Conformance With Simulator Requirements Specified in 10 CFR 55.46," of this report. The inspectors also reviewed the licensee's overall examination security program.

b. Findings

No findings of significance were identified.

.4 Written Examination and Operating Test Results

a. Inspection Scope

The inspectors reviewed the pass/fail results of individual written examinations, individual operating tests, and crew dynamic simulator operating tests (required to be given per 10 CFR 55.59(a)(2)) administered by the licensee during calender year 2004.

b. Findings

No findings of significance were identified.

.5 Licensee Training Feedback System

a. Inspection Scope

The inspectors assessed the methods and effectiveness of the licensee's processes for revising and maintaining its LORT program up to date, including the use of feedback from plant events and industry experience information. The inspectors reviewed the licensee's quality assurance oversight activities, including licensee training department self-assessment reports. The inspectors evaluated the licensee's ability to assess the effectiveness of its LORT program and their ability to implement appropriate corrective actions.

b. Findings

No findings of significance were identified.

.6 Licensee Remedial Training Program

a. Inspection Scope

The inspectors assessed the adequacy and effectiveness of the remedial training conducted since the previous annual requalification examinations. The inspectors assessed the training planned for the current examination cycle to ensure that they addressed weaknesses in licensed operator or crew performance identified during training and plant operations. The inspectors reviewed remedial training procedures and individual remedial training plans.

b. Findings

No findings of significance were identified.

.7 Conformance With Operator License Conditions

a. Inspection Scope

The inspectors reviewed the facility and individual operator licensees' conformance with the requirements of 10 CFR Part 50 and 10 CFR Part 55. Specifically, the inspectors reviewed the facility licensee's program for shift manning and maintaining active operator licenses to assess compliance with 10 CFR 50.54(m), and 10 CFR 55.53(e) and (f). The inspectors reviewed the procedural guidance and the process for tracking on-shift hours for licensed operators and which control room positions were granted credit for maintaining active operator license proficiency. In addition, the inspectors reviewed the facility licensee's LORT program to assess compliance with the requalification program requirements as described by 10 CFR 55.59(c).

b. Findings

Introduction: The inspectors identified one finding of very low safety significance (Green) associated with a Non-Cited Violation of 10 CFR 55.53(e), "Conditions of License," for the failure to complete specified requirements (10 CFR 55.53(f)) to restore an inactive operator's license to active status prior to allowing the operator to resume control room watch standing activities.

Description: The inspectors determined that Senior Reactor Operators (SROs) were receiving watchstanding proficiency credit for standing watches at the Shift Manager, Control Room Supervisor (CRS), and the Shift Engineer/Shift Technical Advisor (SE/STA) watchstations. Two SRO watchstations are required by 10 CFR 50.54(m) to be continuously manned by operators that maintain an active SRO license while the plant is operating. At the Palisades Nuclear Plant, these two watchstations are the Shift Manager and the CRS. The SE/STA position was required by the station's technical specifications, but was not required by the station's technical specifications to be filled

by an individual holding an SRO license. The licensee's Administrative Procedure No. 4.00, "Operations Organization, Responsibilities and Conduct," Section 4.2.3.d.4, "Shift Engineer/Shift Technical Advisor Qualifications," required the SE/STA to have an active SRO license. Procedure No. 4.00, Section 5.3.1, "Minimum Staffing," allowed an SE/STA with an inactive SRO license to fill the SE/STA position in the control room under certain conditions. The SE/STA responsibilities defined by Administrative Procedure 4.00 included: (1) duties normally assigned to a control room advisor in the areas of engineering; (2) predicting expected plant response for system operations; (3) evaluation of plant equipment and system operating conditions; (4) evaluation of compliance with technical specifications and other documents; and (5) other administrative duties in the control room. The procedure did not require the SE/STA to supervise or direct activities of control room operators nor did it require the watchstander to exercise any command/control functions of the SRO watchstation.

Section 55.53(e) of 10 CFR, "Conditions of Licenses," stated, in part, "To maintain active status, the licensee shall *actively perform the functions of an operator or senior operator* on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter." "A*ctively performing the functions of an operator or senior operator"* (10 CFR 55.4), was defined as, "an individual has a position on the shift crew that requires the individual to be licensed as defined in the facility's technical specifications, and that the individual carries out and is responsible for the duties covered by that position." The inspectors determined that since the SE/STA was not required to be licensed per the station's technical specifications and the command/control function of the SRO was not being exercised at the SE/STA watchstation, no credit should be granted for SRO watch proficiency at the SE/STA watchstation. When no credit was allowed for the SE/STA watchstation, several operator licenses became inactive at the end of the next calendar quarter. Section 55.53(e) of 10 CFR stated, in part, "If a licensee has not been *actively performing the functions of an operator or senior operator*, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section." Operators whose licenses were inactive because credit was not warranted for the SE/STA watchstation performed duties in the control room at watchstations requiring an active operator license without completing the requirements of 10 CFR 55.53(f) to re-activate the license prior to resuming those duties. The licensee stated that they believed that NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," provided USNRC acceptance of proficiency credit for additional licensed operator watchstanders in the control room. The inspectors determined that station personnel had not applied all of the clarifying statements on this issue in NUREG-1262, and had a misunderstanding of the guidance provided in NUREG-1262.

The inspectors determined that the SE/STA was not a position of responsibility in the control room and did not satisfy the definition of "*actively performing the functions of an operator.*" Because individuals performed duties requiring an active SRO license when their license was inactive, the inspectors concluded that a significance evaluation was warranted.

Analysis: In accordance with Inspection Manual Chapter 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Disposition Screening," the inspectors determined that this performance deficiency was more than minor since the issue affected the Mitigating Systems Cornerstone, Human Performance Attribute, because licensed senior operators that are not current in watchstanding proficiency may commit operator errors that could cause mitigating systems to fail to respond properly, or the senior operator may issue incorrect directives to other operators that would cause mitigating systems to be mis-operated. Either of these errors would impact the cornerstone objective by increasing the likelihood of an undesirable consequence during an event.

The inspectors reviewed this issue in accordance with Manual Chapter 0609, "Significance Determination Process (SDP)," Appendix I, "Operator Requalification Human Performance Significance Determination Process (SDP)." The SDP Appendix I flowchart, decision box 27, focused on general record deficiencies exceeding a specified threshold of 20 percent of the records reviewed. The sample review of 27 operators revealed that seven operators had inactive senior operator licenses (26 percent). The inspectors determined from the SDP that this finding was of very low safety significance (Green).

Enforcement: Section 55.53(e) of 10 CFR, "Conditions of Licenses," required, in part, that "If a licensee has not been actively performing the functions of an operator or senior operator, the licensee may not resume activities authorized by a license issued under this part except as permitted by paragraph (f) of this section."

Contrary to the above, SROs with inactive licenses were performing license duties in the control room prior to completing the requirements of 10 CFR 55.53(f) to restore their licenses to active status.

The facility licensee stated that this had been their normal practice for the last 10 years (approximately). The licensee reviewed their watchstanding proficiency credits and determined that as many as nine SROs performed licensed duties with an inactive license in the previous four calendar quarters (April 2003 through March 2004). The licensee entered this issue into their corrective action program as CAP040816. The proficiency review conducted by the licensee determined which SRO licensed individuals were in active status without taking credit for standing control room watches in the SE/STA position. The active status list for SRO licensed individuals was revised to ensure that the individuals on the list were not taking credit for the SE/STA position to satisfy the requirement to be on active status. Because this violation was of very low safety significance and was entered into the licensee's corrective action program, this violation is being treated as a Non-Cited Violation (NCV), consistent with Section VI.A of the NRC Enforcement Policy. (NCV 05000255/2004008-01)

.8 Conformance With Simulator Requirements Specified in 10 CFR 55.46

a. Inspection Scope

The inspectors assessed the adequacy of the licensee's simulation facility (simulator) for use in operator licensing examinations and for satisfying experience requirements as prescribed in 10 CFR 55.46, "Simulation Facilities." The inspectors also reviewed a sample of simulator performance test records (i.e., transient tests, scenario test and discrepancy resolution validation test), simulator discrepancy and modification records, and the process for ensuring continued assurance of simulator fidelity in accordance with 10 CFR 55.46. The inspectors reviewed and evaluated the discrepancy process to ensure that simulator fidelity was maintained. Open simulator discrepancies were reviewed for importance relative to the impact on 10 CFR 55.45 and 55.59 operator actions, as well as on nuclear and thermal hydraulic operating characteristics. The inspectors conducted interviews with members of the licensee's simulator staff about the configuration control process and completed the IP 71111.11, Appendix C, checklist to evaluate whether or not the licensee's plant-referenced simulator was operating adequately as required by 10 CFR 55.46(c) and (d).

b. Findings

No findings of significance were identified.

4OA2 Problem Identification and Resolution

.1 Biennial Sample Review

a. Inspection Scope

The inspectors reviewed a licensee training department self-assessment report. The licensee's self-assessment reviewed the licensed operator training program two months prior to this inspection activity. The self-assessment was reviewed to ensure that any issues identified during the self-assessment were appropriately evaluated, prioritized, and controlled.

b. Findings

There were no findings of significance.

4OA6 Meeting(s)

.1 Exit Meeting

The inspectors presented the inspection results to Mr. G. Packard on May 20, 2004. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee
D. Malone, Site Vice President
G. Baustian, Training Manager
R. Bender, Requal Operator Training Supervisor
M. Carlson, Engineering Director
T. Davis, Operations Training Supervisor
B. Dotson, Regulatory Compliance
G. Hettel, Plant General Manager
D. Malone, Regulatory Compliance Supervisor
G. Packard, Operations Manager
P. Schmidt, Simulator Training
G. Sleeper, Operations Training Coordinator
G. Smith, Initial Operator Training Supervisor
A. Stover, Nuclear Oversight Manager
D. VandeWalle, Assistant Operations Manager
S. Wawro, Consumers Energy/Asset Manager

Nuclear Regulatory Commission
S. Guenther, NRR
R. Lanksbury, Chief, Operations Branch, RIII
J. Lennartz, Senior Resident Inspector, Palisades

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

05000255/2004008-01	NCV	Green. Licensed Operators Were Not Completing the Requirements of 10 CFR 55.53(f) to Reactivate Their Licenses Prior to Resuming Watchstation Activities after Their Licenses Became Inactive. The Licenses Became Inactive Because Operators Were Taking Credit for Watchstanding at a Watchstation That Did Not Qualify as a Licensed Operator Required Watchstation. A Violation of 10 CFR 55.53(e) Requirements Occurred When Operators Executed Licensed Operator Duties Prior to Completing 10 CFR 55.53(f) Reactivation Requirements.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1R11 Licensed Operator Requalification

Licensee Event Report 02-002; Automatic Reactor Trip and Safety Injection Actuation; dated January 21, 2003

Palisades ROP Plant Issue Matrix from 01/01/2002 to 02/24/2004; dated February 24, 2004

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/02-02(DRP); dated April 18, 2002

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/02-03(DRS); dated July 1, 2002

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/02-04(DRP); dated July 17, 2002

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/02-07(DRP); dated October 22, 2002

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/02-09; dated January 24, 2003

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/03-02; dated April 29, 2003

Palisades Nuclear Generating Plant NRC Inspection Report 50-255/03-04; dated July 14, 2003

Palisades Nuclear Generating Plant NRC Special Inspection Report 50-255/03-05; dated May 19, 2003

Palisades Nuclear Generating Plant NRC Integrated Inspection Report 05000255/2003006; dated October 30, 2003

Palisades Nuclear Generating Plant NRC Inspection Report 05000255/2003008; dated January 22, 2004

Palisades Nuclear Plant Administrative Procedure 4.00; Operations Organization, Responsibilities and Conduct; Revision 26; dated March 11, 2004

Palisades Nuclear Plant Administrative Procedure 11.00; Plant Training Organization and Responsibilities; Revision 20; dated December 22, 2003

Palisades Licensed Operator Requalification Training Program Description; Revision 2; dated April 30, 2003

Palisades Nuclear Training Procedure PNT 6.0; Operator NRC Licensing Application and Renewal Requirements; Revision 4; dated April 9, 2002

Palisades Nuclear Training Procedure PNT 7.0; Simulator Training; Revision 7; dated June 13, 2003

Palisades Nuclear Training Procedure PNT 8.0; Simulator Configuration Control; Revision 6; dated September 23, 2003

Palisades Nuclear Training Procedure PNT 9.0; Simulator Testing; Revision 2; dated December 4, 2002

Palisades Nuclear Training Procedure PNT 12.0; Licensed Operator Examination Security; Revision 5; dated October 29, 2003

Palisades Nuclear Training Procedure PNT 13.0; Evaluation and Test Item Development; Revision 1; dated December 14, 2003

Palisades Nuclear Training Procedure PNT 13.2; Licensed Operator Requalification Examination Development and Administration; Revision 5; dated June 26, 2003

Six Licensed Operators Medical Records; dated various

LOR Training Matrix Attachment 1 (Sample Plan); dated 2001 through 2006

Written Examinations for 2003 Requalification Examination (4 total with an average of 30 questions each); dated various

Dynamic Simulator Scenarios for 2004 Requalification Examination (12 total); dated various

Simulator Job Performance Measures for 2004 Requalification Examination (12 total); dated various

In-Plant Job Performance Measures for 2004 Requalification Examination (8 total); dated various

List of Simulator Deficiency Reports Closed in Last Year; dated March 22, 2004

List of All Open Simulator Deficiency Reports; dated March 22, 2004

List of Open Performance Test Failures; dated March 22, 2004

Simulator Testing Matrix (2002 through 2005); dated various

Palisades Simulator FC-2001-0978 Fuel Cycle 17 Validation Test; dated March 21, 2003 through March 28, 2003

Palisades Nuclear Plant Simulator Operability Transient Performance Tests (11 total); dated various

Palisades Nuclear Plant Simulator Operability Performance Tests (Normal Plant Evolutions Tests)(11 total); dated various

Palisades Nuclear Plant Simulator Operability Test; Steady State Parameters; dated December 31, 2003

Palisades Nuclear Plant Simulator Performance Test; Real Time and Repeatability Verification; dated December 31, 2003

List of Modifications Operable in the Plant but Not Installed in the Simulator (that impact the simulator); dated March 22, 2004

Simulator Review Board Meeting Minutes; dated various from February 14, 2003 through February 24, 2004

Nuclear Oversight Observation Report # 2002-004-8-030; dated December 4, 2002

Nuclear Oversight Observation Report # 2003-001-8-029; dated February 14, 2003

Nuclear Oversight Observation Report # 2003-001-8-052; dated March 18, 2003

Nuclear Oversight Observation Report # 2003-002-8-039; dated June 10, 2003

Nuclear Oversight Observation Report # 2003-003-8-023; dated September 29, 2003

Self-Assessment Report; Training; Assessment Number ASAT0200038; dated March 13-14, 2002

Self-Assessment Number 040013 NOS Assessment of Operation's Training and Self-Assessment of Operator Requalification Training; dated January 12-16, 2004

QF-1050-01 (FP-T-SAT-50); Training Feedback Summary Form; dated various from August 15, 2003 through March 2, 2004

QF-1050-01a (FP-T-SAT-50); Course/Cycle Feedback Summary Form; dated November 11, 2003

LOR "Focus on Performance" Plan For Shift; dated various from February 10, 2004 through February 25, 2004

Crew Competency Trend; various; dated February 1, 2003 through February 29, 2004

Computerized List of Training Completion; dated various from June 18, 2003 through March 5, 2004

Palisades Nuclear Plant Administrative Procedure 4.05; Attachment 1; Operator Performance Evaluation; dated various

Palisades Nuclear Plant Administrative Procedure 4.05; Attachment 2; Certification for Resuming Active License Status; dated various

QF-1040-04 (FP-T-SAT-40); Remediation/Makeup Training Form; dated various

Palisades Nuclear Plant NMC Training Fleet Procedure; Implementation Phase; FP-T-SAT-40; Revision 3; dated February 9, 2004

Palisades Nuclear Training Procedure PNT 12.0; Attachment 3; Revision 3; Consumers Energy Administered Examination Security Agreement; dated various

Crew Critical Tasks; PSA Human Error Summary and Event Sequence; dated May 8, 2003

Palisades Curriculum Review Committee Meeting Minutes; dated various June 5, 2003 through February 24, 2004

Staff Licensed Operations Proficiency Watch Record; dated various from First Quarter 2003 through First Quarter 2004

Palisades Technical Specifications; Section 5.2.2; Plant Staff; Amendment Number 196

Palisades Nuclear Plant Final Safety Analysis Report Updated; Section 14.15; Steam Generator Tube Rupture With a Loss of Offsite Power; Revision 23

Palisades Updated Final Safety Analysis Report; Section 6.1; Safety Injection System; Revision 24

CAP034382; Ineffective Implementation of Ops Policy De-Sensitizes Operators Alarm Response; dated March 23, 2003

CAP036948; Suggested Areas for Improvement Noted by NRC During the Conduct of NRC ILT Exam; dated August 5, 2003

CAP037444; Use of Simulator Control Room Placards for Operator Actions; dated March 27, 2003

CAP037444; Implied Negative Training Received in Licensed Operator Requalification; dated September 25, 2003

CAP039005; Needs Assessment Requires Training for LOR on Wiring Schemes for Lighting Units; dated December 11, 2003

CAP039436; Under Instruction Watches Required for Licensed Operators to Regain Proficiency; dated January 13, 2004

CAP039437; Formal Policy Does Not Exist to Change from “Active” License Status to “Inactive”; dated January 13, 2004

CAP039438; Operations Training Job Performance Measures (JPMs) Do Not Include Knowledge/Ability Values; dated January 13, 2004

LIST OF ACRONYMS USED

CAP	Corrective Action Program
CFR	Code of Federal Regulations
CRS	Control Room Supervisor
DRS	Division of Reactor Safety
ILT	Initial License Training
IP	Inspection Procedure
JPM	Job Performance Measure
LORT	Licensed Operator Requalification Training
NCV	Non-Cited Violation
NMC	Nuclear Management Company
USNRC	U. S. Nuclear Regulatory Commission
PNT	Palisades Nuclear Training
ROP	Reactor Oversight Process
SDP	Significance Determination Process
SE/STA	Shift Engineer/Shift Technical Advisor
SRO	Senior Reactor Operator