

August 14, 2003

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

SUBJECT: PALISADES PLANT - RESPONSE TO NRC BULLETIN 2003-01, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY SUMP RECIRCULATION AT PRESSURIZED-WATER REACTORS" (TAC NO. MB9595)

Dear Mr. Cooper:

This letter acknowledges receipt of the Nuclear Management Company, LLC (NMC), response dated August 5, 2003, to Nuclear Regulatory Commission (NRC) Bulletin 2003-01, "Potential Impact of Debris Blockage on Emergency Sump Recirculation at Pressurized-Water Reactors," dated June 9, 2003. The NRC issued Bulletin 2003-01 to all pressurized-water reactor licensees requesting that they provide a response, within 60 days of the date of Bulletin 2003-01, that contains either the information requested in the following Option 1 or Option 2 stated in Bulletin 2003-01:

- Option 1: State that the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions have been analyzed with respect to the potentially adverse post-accident debris blockage effects identified in this bulletin, taking into account the recent research findings described in the Discussion section, and are in compliance with all existing applicable regulatory requirements.

- Option 2: Describe any interim compensatory measures that have been implemented or that will be implemented to reduce the risk which may be associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete. If any of the interim compensatory measures listed in the Discussion section will not be implemented, provide a justification. Additionally, for any planned interim measures that will not be in place prior to your response to this bulletin, submit an implementation schedule and provide the basis for concluding that their implementation is not practical until a later date.

You provided an Option 2 response. You stated in your response that you have already implemented certain interim compensatory measures and in addition will implement the following additional interim compensatory measures by the dates or milestones listed:

1. NMC will develop and implement training on sump clogging by January 31, 2004.
2. NMC will revise a plant off normal procedure (ONP) to lower the entry conditions from the current Technical Specification value of 1 gallon per minute (gpm) unidentified leakage to 0.15 gpm unidentified leakage. The reactor trip value in the ONP will also be lowered from 20 gpm leakage to 10 gpm unidentified leakage. This procedure revision will be implemented by January 31, 2004.
3. NMC will submit an implementation schedule for revising plant emergency operating procedures, where appropriate, to stop or throttle redundant pumps that are not necessary to provide required flows to cool containment and the reactor core within 30 days of the issuance of the generic guidance by the Westinghouse Owners Group, currently expected by March 31, 2004.
4. NMC will develop and implement a procedure to provide specific direction for refilling the safety injection refueling water tank from alternative water sources. This procedure will be completed by January 31, 2004.
5. NMC will determine enhancements to provide more aggressive containment cleaning requirements prior to containment closeout and measures will be implemented during the next refueling outage.
6. NMC will evaluate enhancements that may improve containment drainage paths. Modifications will be implemented during the next refueling outage, consistent with the evaluation.

In addition, your response provided the following commitment:

NMC will analyze the emergency core cooling system and containment spray system recirculation functions with respect to the potentially adverse post-accident debris blockage effects on the containment sump, taking into account the recent research findings, to verify compliance with applicable regulatory requirements. NMC will continue to work with the Nuclear Energy Institute (NEI) to follow Generic Safety Issue 191 resolution methodology, currently being developed by NEI. NMC will implement the methodology, as appropriate for Palisades.

The NRC staff considered your Option 2 response for compensatory measures that have been and will be implemented to reduce the interim risk associated with potentially degraded or nonconforming ECCS and CSS recirculation functions until an evaluation to determine compliance is complete. Based on your response, the NRC staff considers your Bulletin 2003-01 60-day response actions to be complete. Please retain any records of your actions in response to Bulletin 2003-01, as the NRC staff may conduct inspection activities regarding this issue.

D. Cooper

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Should you have any questions, please contact me at 301-415-1471 or the lead Project Manager for this issue, John G. Lamb, at 301-415-1446.

Sincerely,

/RA/

Johnny H. Eads, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

cc: See next page

D. Cooper

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Should you have any questions, please contact me at 301-415-1471 or the lead Project Manager for this issue, John G. Lamb, at 301-415-1446.

Sincerely,

/RA/

Johnny H. Eads, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
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Docket No. 50-255

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August 2003