

Mr. Nathan L. Haskell
Director, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

June 3, 1999

SUBJECT: PALISADES PLANT - EVALUATION OF INSERVICE INSPECTION PROGRAM
REQUEST FOR RELIEF NO. RR-12 (TAC NO. MA3809)

Dear Mr. Haskell:

We have completed our review of Request for Relief No. RR-12, proposed by Consumers Energy for the Palisades Plant third 10-year interval program for inservice inspection. This request was submitted by your letters dated October 6, 1998, and February 12, 1999. The staff reviewed this relief request against the requirements of Section XI of the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* pursuant to Section 50.55a of Part 50 to Title 10 of the *Code of Federal Regulations*. The results of the staff review are detailed in the enclosed safety evaluation.

The staff concludes that it is impractical to comply with the applicable requirements of the ASME Code. The staff has further determined that imposing the Code requirements would impose a significant burden on Consumers Energy. The staff finds that the proposed alternative examination using techniques developed under the Performance Demonstration Initiative provides reasonable assurance of the structural integrity of the subject welds. Therefore, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) based on the impracticality of performing the required inspections. The relief granted is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden that could result if the requirements were imposed on the facility.

If you have any questions regarding this letter or the enclosed safety evaluation, please contact Robert Schaaf at (301) 415-1312.

Sincerely,

Original signed by:

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: Safety Evaluation

cc w/encl: See next page

DISTRIBUTION: See attached page

* No major changes to SE

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**See previous concurrence

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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "Claudia M. Craig".

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: Safety Evaluation

cc w/encl: See next page

Mr. Nathan L. Haskell
Consumers Energy Company

Palisades Plant

cc:

Mr. Thomas J. Palmisano
Site Vice President
Palisades Plant
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Drinking Water and Radiological
Protection Division
Michigan Department of
Environmental Quality
3423 N. Martin Luther King Jr Blvd
P. O. Box 30630 CPH Mailroom
Lansing, Michigan 48209-8130

Mr. Robert A. Fenech, Sr Vice Pres
Nuclear, Fossil, and Hydro Operations
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201

Michigan Department of Attorney
General
Special Litigation Division
630 Law Building
P.O. Box 30212
Lansing, Michigan 48909

Arunas T. Udrys, Esquire
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Jerry Sarno, Supervisor
Covert Township
P. O. Box 35
Covert, Michigan 49043

Office of the Governor
P. O. Box 30013
Lansing, Michigan 48909

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Palisades Plant
27782 Blue Star Memorial Highway
Covert, Michigan 49043

DISTRIBUTION FOR PALISADES PLANT RELIEF REQUEST NO. RR-12 DATED: June 3, 1999

Docket File (50-255)

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PDIII-1 r/f

C. Thomas/C. Craig

T. Harris

R. Schaaf

OGC

G. Hill (2)

P. Patnaik

ACRS

A. Vogel, RIII

SEDB (e-mail R. Scholl)

T. Hiltz, EDO