

September 27, 2000

Mr. Nathan L. Haskell
Director, Licensing and Performance Assessment
Palisades Plant
27780 Blue Star Memorial Highway
Convert, MI 49043

SUBJECT: PALISADES PLANT - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 98-02, "LOSS OF REACTOR COOLANT INVENTORY AND ASSOCIATED POTENTIAL FOR LOSS OF EMERGENCY MITIGATION FUNCTION WHILE IN A SHUTDOWN CONDITION" (TAC NO. MA4797)

Dear Mr. Haskell:

On May 28, 1998, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 98-02 to all holders of operating licenses for pressurized-water reactors (PWRs), except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel. The NRC issued GL 98-02 to request that PWR licensees evaluate a September 17, 1994, event that occurred at Wolf Creek, which had the potential to draindown the reactor coolant system to the safety injection refueling water (SIRW) storage tank and, at the same time, render the emergency core cooling system (ECCS) and residual heat removal (RHR) system inoperable by introducing a steam/water mixture to the suction side of the ECCS and RHR pumps. Addressees of GL 98-02 were requested to provide the following information within 180 days: (1) an assessment of whether the addressee's facility is vulnerable to the September 17, 1994, Wolf Creek event, and (2), if the facility is found to be vulnerable, an assessment of the plant-specific 10 CFR Part 50, Appendix B, quality assurance program attributes that would prevent the subject event. If the addressee's facility was determined to be vulnerable, a response to information item (1) was to be provided pursuant to 10 CFR 50.54(f) and 10 CFR 50.4, and the responses to information items (1) and (2) were to be kept in a licensee's retrievable system for use by the NRC staff on an as-needed basis.

In response to GL 98-02, you provided a letter dated November 24, 1998, for the Palisades Plant. The submittal indicated that Palisades was vulnerable to the type of incident that occurred at Wolf Creek and further indicated that the plant evaluation concerning the subject vulnerability (information item (2) of GL 98-02) was being kept in a retrievable licensee system that the NRC could verify on an as-needed or sample basis, in accordance with GL 98-02.

By letter dated June 8, 2000, the Region III NRC staff issued NRC Inspection Report No. 50-225/2000007(DRP). This inspection report contained details of the NRC staff's on-site verification of activities that you undertook in response to GL 98-02 for Palisades. Specifically, the inspectors verified that you had effectively implemented administrative controls,

configuration management, and operating procedures to preclude an inadvertent draindown event as described in GL 98-02. The inspectors reviewed applicable portions of the following documents:

- System Operating Procedure (SOP)-1, "Primary Coolant System," Revision 47
- SOP-3, "Safety Injection and Shutdown Cooling System," Revision 41
- General Operating Procedure (GOP)-14, "Shutdown Cooling Operations," Revision 11
- Off Normal Procedure (ONP)-17, "Loss of Shutdown Cooling," Revision 25
- Palisades Administrative Procedure - No. 4.02, "Control of Equipment," Revision 17
- Technical Specification Surveillance Procedure QO-16, "Inservice Test Procedure - Containment Spray Pumps," Revision 16
- Technical Specification Surveillance Procedure QO-19, "Inservice Test Procedure - HPSI Pumps and ESS Check Valve Operability Test," Revisions 20
- Technical Specification Surveillance Procedure QO-20, "Inservice Test Procedure - Low Pressure Safety Injection Pumps," Revisions 10 and 12
- Technical Specification Surveillance Procedure QO-43, "SIRW Tank Outlet Check Valves (Including Boron Equalization) and Shutdown Cooling Bypass and Loop Isolation Valves Inservice Test," Revisions 1

Also, the inspectors reviewed operator training on the event by reviewing Palisades internal correspondence (i.e., B. C. Bauer to Plant Operators "ONP-17 Revisions," dated October 14, 1999).

The above measures were found by the inspectors to be appropriate.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for Palisades; therefore, we consider GL 98-02 to be closed for Palisades.

Sincerely,

/RA by B. Mozafari for/

Darl S. Hood, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-225

cc: See next page

configuration management, and operating procedures to preclude an inadvertent draindown event as described in GL 98-02. The inspectors reviewed applicable portions of the following documents:

- System Operating Procedure (SOP)-1, "Primary Coolant System," Revision 47
- SOP-3, "Safety Injection and Shutdown Cooling System," Revision 41
- General Operating Procedure (GOP)-14, "Shutdown Cooling Operations," Revision 11
- Off Normal Procedure (ONP)-17, "Loss of Shutdown Cooling," Revision 25
- Palisades Administrative Procedure - No. 4.02, "Control of Equipment," Revision 17
- Technical Specification Surveillance Procedure QO-16, "Inservice Test Procedure - Containment Spray Pumps," Revision 16
- Technical Specification Surveillance Procedure QO-19, "Inservice Test Procedure - HPSI Pumps and ESS Check Valve Operability Test," Revisions 20
- Technical Specification Surveillance Procedure QO-20, "Inservice Test Procedure - Low Pressure Safety Injection Pumps," Revisions 10 and 12
- Technical Specification Surveillance Procedure QO-43, "SIRW Tank Outlet Check Valves (Including Boron Equalization) and Shutdown Cooling Bypass and Loop Isolation Valves Inservice Test," Revisions 1

Also, the inspectors reviewed operator training on the event by reviewing Palisades internal correspondence (i.e., B. C. Bauer to Plant Operators "ONP-17 Revisions," dated October 14, 1999).

The above measures were found by the inspectors to be appropriate.

The NRC staff has reviewed your response to GL 98-02 and has concluded that (1) all the information requested by GL 98-02 has been provided, and (2) that your on-site activities adequately addressed the concerns of GL 98-02 for Palisades; therefore, we consider GL 98-02 to be closed for Palisades.

Sincerely,
/RA by B. Mozafari for/
 Darl S. Hood, Senior Project Manager, Section 1
 Project Directorate III
 Division of Licensing Project Management
 Office of Nuclear Reactor Regulation

Docket No. 50-225

cc: See next page

DISTRIBUTION:

PUBLIC	JLamb	MRazzaque
PDIII-1 Reading	OGC	MJordan, RIII
CCraig	ACRS	
DHood	JDonohew	
RBouling	CLauron	

*Previously Concurred

OFFICE	PDIII-1/PM	PDIII-1/LA	PDIV-1/LPM*	SRXB/SC*	PDIII-1/SC
NAME	BMozafari for DHood	RBouling	JDonohew	RCarusio	BWetzel for CCraig
DATE	9/27/00	9/25/00	09/19/00	09/20/00	9/27/00

ACCESSION NO. ML003754489

OFFICIAL RECORD COPY

Palisades Plant

cc:

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

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

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

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

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

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

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Palisades Plant
27782 Blue Star Memorial Highway
Covert, MI 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, MI 48909-8130

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