



A CMS Energy Company

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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT  
SQUG OUTLIER RESOLUTION - REVISION OF COMMITMENT**

On May 23, 1995, Consumers Power Company submitted a response to Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46." When the report was submitted, a total of 80 items were identified as outliers to the Generic Implementation Procedure (GIP) methodology. Of these 80 items, 78 have been resolved either through further analysis, testing, walkdown verification or modification. One outlier involving a modification is scheduled for completion prior to our 2001 Refueling Outage. The final remaining outlier issue concerns the Safety Injection and Refueling Water (SIRW) tank.

The Palisades SIRW tank is a 300,000 gallon, 46 foot diameter aluminum tank, situated on top of our Auxiliary Building. The tank was initially included on the Seismic Qualification Utility Group (SQUG) Safe Shutdown Equipment List (SSEL) for inventory control as a source of make-up water to the Primary Coolant System (PCS), to compensate for losses through the primary coolant pump seals, and to compensate for shrinkage during the cool down phase. The tank structural configuration, material, water level and anchorage details have made analytical qualification results uncertain and modification impractical. Therefore, the SIRW tank and its associated flow path are being removed from the SQUG SSEL. The SIRW Tank has subsequently been re-evaluated and determined to be operable.

A preferred alternate make-up path for PCS Inventory Control is being developed from other available make-up sources. This preferred path will entail the addition of a limited number of major components along with their supporting equipment to the SSEL. These changes to the SQUG SSEL make it impractical to completely resolve this final outlier by the current commitment date of the "end of the second refueling outage following receipt of the site-specific SER on the GIP methodology for USI A-46

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resolution." The site-specific SER on the GIP methodology was received September 25, 1998, which makes the commitment due at the end of the 2001 Refueling Outage.

Accordingly, Consumers Energy is revising its commitment for resolution of the final outlier as identified in the following "Summary of Commitments".

### SUMMARY OF COMMITMENTS

This letter contains no new commitments and one revision to an existing commitment:

Existing commitment made September 27, 1996:

CPCo will disposition all USI A-46 outliers at Palisades before the end of the second refueling outage following the receipt of a Palisades-specific Safety Evaluation Report (SER) that approves the use of GIP-2 methodology for resolution of USI A-46 at Palisades.

Revised Commitment:

Consumers Energy will disposition all USI A-46 outliers at Palisades before the end of the 2002 Refueling Outage.



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