

January 16, 2001

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT**  
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING  
GENERIC LETTER 96-06 (TAC NO. M96844)

Generic Letter (GL) 96-06, "Assurance of Equipment Operability and Containment Integrity During Design Basis Accident Conditions," was issued on September 30, 1996. On January 27, 1997, Consumers Energy submitted its 120-day response to GL 96-06. In addressing the vulnerability of the Containment Air Cooler (CAC) discharge piping to waterhammer damage, it was concluded that any resulting piping stresses would be less than Palisades interim operability criteria set forth in plant design specifications. This letter provided a commitment to verify compliance with the FSAR piping design criteria for the CAC discharge piping prior to the completion of the 1998 refueling outage. The completion date for this commitment was changed to the 1999 refueling outage in a January 29, 1998, submittal.

On June 18, 1998, the NRC issued a request for additional information (RAI) regarding our response to GL 96-06. Since that time, Consumers has been participating in the joint Nuclear Energy Institute (NEI) and Electric Power Research Institute (EPRI) industry initiative to develop a technical basis document that will justify an alternative methodology for analyzing waterhammer and two-phase flow in low-pressure systems. The NRC has recognized licensee participation in this initiative and is allowing our response to the RAI to follow its completion (as described in our August 26, 1998, letter). As a result, the August 26, 1998, letter also revised the commitments to their present form. The first commitment is to respond to the RAI within 60 days after the industry initiative final report has been issued. The second commitment to verify compliance with FSAR piping design criteria for the CAC discharge piping was rescheduled from prior to completion of the 1999 refueling outage to the 2001 refueling outage.

The NEI/EPRI industry initiative has yet to be completed. The technical basis document has been issued to initiative members in draft form and has not yet been dispositioned by the NRC. As a result, the commitments described above are being revised. The revisions preserve the intent of the necessary actions and remove reference to meeting the second commitment prior to the completion of a specific refueling outage. This would eliminate the need for subsequent update submittals,

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should the initiative extend significantly into the future. Given the duration of this initiative since its inception and the extent of analysis work that may be necessary to address the technical issues, additional time is also being allowed to respond to the RAI questions and to appropriately plan and schedule any final actions that may be needed to ultimately resolve the issues.

### SUMMARY OF COMMITMENTS

This letter contains revisions to both existing commitments.

The first existing commitment is:

The response to the RAI regarding GL 96-06, issued by the NRC on June 18, 1998, will be submitted within 60 days after the industry initiative final report has been issued.

The revision to the existing commitment is:

The response to the RAI regarding GL 96-06, issued by the NRC on June 18, 1998, will be submitted within 120 days after the industry initiative final report has been issued and dispositioned by the NRC.

The second existing commitment is:

Compliance with FSAR piping design criteria for the Containment Air Cooler (CAC) discharge piping will be verified prior to the completion of the 2001 refueling outage.

The revision to the existing commitment is:

Compliance with FSAR piping design criteria for the Containment Air Cooler (CAC) discharge piping, when subjected to realistically predicted waterhammers, will be verified prior to the completion of the refueling outage after the first full operating cycle following the NRC disposition of the industry initiative final report.



Nathan L. Haskell  
Director, Licensing & Performance Assessment

CC Administrator, Region III, USNRC  
Project Manager, NRR, USNRC  
NRC Resident Inspector - Palisades