

December 6, 1989

Docket No. 50-255
Serial No. PAL-89-040

Mr. Kenneth W. Berry
Director, Nuclear Licensing
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

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Dear Mr. Berry:

SUBJECT: PALISADES PLANT, LICENSE NO. DPR-20: EXEMPTION FROM CERTAIN
APPENDIX J REQUIREMENTS FOR AIR LOCK TESTING (TAC 74369)

The Commission has issued the enclosed Exemption to Provisional Operating License No. DPR-20 for the Palisades Plant. The Exemption is in response to your request dated August 25, 1989, for exemption from certain of the requirements of Appendix J to 10 CFR Part 50. Specifically, the Exemption provides partial relief from the requirement of Paragraph III.D.2.(b)(ii) to leak test, at or above the calculated design basis accident peak containment pressure (Pa), containment air locks which were opened during a period when containment integrity was not required. The Exemption will permit the substitution of a between-the-seals leak test at a reduced pressure but not less than 10 psig provided that no maintenance, modification, or other activity has been performed which could affect the sealing capability of the air locks.

A copy of the Exemption is being forwarded to the Office of the Federal Register for publication.

Sincerely,

Original signed by

Albert W. De Agazio, Senior Project Manager
Project Directorate III-1
Division of Reactor Projects - III, IV,
V & Special Projects
Office of Nuclear Reactor Regulation

DF01
/

Enclosure:
As stated

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
December 6, 1989

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Serial No. PAL-89-040

Mr. Kenneth W. Berry
Director, Nuclear Licensing
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

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Sincerely,

A handwritten signature in cursive script that reads "Albert W. De Agazio".

Albert W. De Agazio, Senior Project Manager
Project Directorate III-1
Division of Reactor Projects - III, IV,
V & Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

Mr. Kenneth W. Berry
Consumers Power Company

Palisades Plant

cc:

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Covert, Michigan 49043

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
CONSUMERS POWER COMPANY
(Palisades Plant)

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Docket No. 50-255

EXEMPTION

I.

Consumers Power Company (the licensee) is the holder of Provisional Operating License No. DPR-20, which authorizes the licensee to operate the Palisades Plant at power levels up to 2530 megawatts thermal. The facility is a pressurized water reactor located on the licensee's site in Van Buren County, Michigan. The license provides, among other things, that it is subject to all rules, regulations, and orders of the Nuclear Regulatory Commission (the Commission) now or hereafter in effect.

II.

Paragraph III.D.2.(b)(ii) of Appendix J to 10 CFR Part 50, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors, states that containment air locks that have been opened during periods when containment integrity is not required by the plant's Technical Specifications shall be tested at the end of such periods at not less than Pa. (Pa is the calculated peak containment pressure for design basis accidents.) Consumers Power Company has requested exemption from this requirement and proposes, in lieu of testing the air lock at Pa, to perform a between-the-seals leak test at a pressure of not less than 10 psig. Consumers Power Company proposes to apply this alternate testing only if no maintenance or modification has been performed on the air lock during the period that could affect the sealing capability; otherwise, the

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testing as required by Paragraph III.D.2.(b)(ii) of Appendix J to 10 CFR Part 50 would be performed. No other provisions of Appendix J to 10 CFR Part 50 are affected by this Exemption.

III.

Whenever the facility is in cold shutdown, defined as when the boron concentration is at shutdown concentration and the primary coolant temperature is less than 210°F, containment integrity is not required. If during this time an air lock door is opened, an overall air lock test at Pa must be performed prior to leaving the cold shutdown condition to comply with Paragraph III.D.2.(b)(ii) of Appendix J to 10 CFR Part 50. The air lock door designs are such that a test at Pa of the entire air lock can be performed only with structural bracing (strongbacks) installed on the inner door. These strongbacks are needed because the pressure exerted on the inner door during the test is in the reverse direction to the pressure exerted during accidents. To conduct the leak test in compliance with Paragraph III.D.2.(b)(ii) requires approximately 24 hours, whereas only two to four hours are required for the alternate testing proposed.

Paragraph III.D.2.(b)(iii) of Appendix J to 10 CFR Part 50 states that containment air locks that have been opened during periods when containment integrity is required by the technical specifications shall be tested within three days. This paragraph also provides that for doors with testable seals, seal testing fulfills this requirement, and further provides for reduced pressure testing of the seals. There is no reason to expect an air lock to leak excessively merely because a door was opened during cold shutdown or refueling vice during other operating conditions provided (1) there has been no maintenance, modification, or other activity that could affect the

leak-tightness or sealing capability of the air lock, (2) the air lock doors are closed in accordance with applicable procedures, and (3) the periodic test at Pa required by Paragraph III.D.2.(b)(i) of Appendix J to 10 CFR Part 50 has been performed within schedule.

The alternate testing proposed will prove air lock integrity following cold shutdown or refueling in the same manner that the air lock is proven during periods when containment integrity is required. Thus, the door seal leak test at reduced pressure (not less than 10 psig) is sufficient to demonstrate continuing integrity of the air locks.

Accordingly, we conclude that Consumers Power Company's proposed approach of substituting reduced-pressure seal leakage testing (at not less than 10 psig) per Paragraph III.D.2.(b)(iii) for the full-pressure testing per Paragraph III.D.2.(b)(ii) of Appendix J is acceptable provided (1) there has been no maintenance, modification, or other activity that could affect the leak tightness or sealing capability of the air lock, (2) the air lock doors are closed in accordance with applicable procedures, and (3) the periodic test at Pa required by Paragraph III.D.2.(b)(i) of Appendix J to 10 CFR Part 50 has been performed within schedule. Whenever conditions (1), (2), or (3) are not met, the requirements of Paragraph III.D.2.(b)(ii) of Appendix J must be met.

The proposed alternative testing of the air locks is sufficient to achieve the underlying purpose of the prescribed Appendix J testing; viz, to verify air lock integrity after closure to assure that containment leakage is within specified technical specifications limits. The Commission has granted previously this same exemption to other plants. Consequently, the special circumstances described by 10 CFR 50.12 (a)(2)(ii) exist in that application

of the regulation in these particular circumstances is not necessary to achieve the underlying purpose of the regulation since the proposed alternative testing accomplishes the intent of the regulation.

IV.

Accordingly, the Commission has determined that pursuant to 10 CFR 50.12(a) this exemption as described in Section III is authorized by law, will not present an undue risk to the public health and safety, and is consistent with the common defense and security. The Commission determines further that special circumstances as provided in 10 CFR 50.12(a)(2)(ii) are present justifying the exemption.

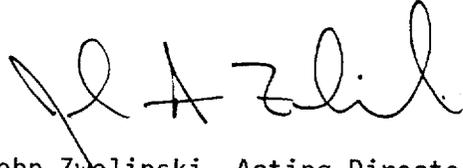
Therefore, the Commission hereby grants the exemption to Paragraph III.D.2(b)(ii) to Appendix J to 10 CFR Part 50 as discussed in Section III except that air locks opened during periods when containment integrity is not required by the Technical Specifications shall be tested at the end of such periods at not less than Pa when maintenance, modification, or other activities that could affect air lock leak-tightness or sealing capability have been performed.

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of this Exemption will have no significant impacts on the environment (54 FR 50461 December 6, 1989).

For further details with respect to this action, see the request for exemption dated August 25, 1989, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, D.C. 20555, and at the Van Zoeren Library, Hope College, Holland, Michigan 49423.

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink, appearing to read "J. Zwolinski". The signature is written in a cursive style with a large initial "J" and "Z".

John Zwolinski, Acting Director
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation