

June 23, 1997

Mr. Thomas C. Bordine
Manager, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -
EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR PART 50, APPENDIX J
REQUIREMENTS FOR CONTAINMENT EMERGENCY ESCAPE AIR LOCK TESTING
(TAC NO. M94528)

Dear Mr. Bordine:

Enclosed is a copy of an "Environmental Assessment and Finding of No Significant Impact" for the Palisades Plant. The assessment relates to your application for exemption dated January 10, 1996, and supplemented February 20, 1997, from certain requirements of 10 CFR Part 50, Appendix J, to perform alternative testing of the emergency escape air lock. The proposed exemption would enable you to perform alternative testing of the emergency escape air lock door seals following air lock leak rate testing.

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

ORIGINAL SIGNED BY

Robert G. Schaaf, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: Environmental Assessment

cc w/encl: See next page

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Palisades Plant

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April 1997

UNITED STATES NUCLEAR REGULATORY COMMISSIONCONSUMERS POWER COMPANYDOCKET NO. 50-255PALISADES PLANTENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from certain requirements of 10 CFR Part 50, Appendix J, for Facility Operating License No. DPR-20, issued to Consumers Power Company, (the licensee), for operation of the Palisades Plant located in Van Buren County, Michigan.

ENVIRONMENTAL ASSESSMENTIdentification of the Proposed Action:

The proposed action would exempt the licensee from certain requirements of 10 CFR Part 50, Appendix J, Option A, section III.D.2.(b)(ii) and III.D.2.(b)(iii), for Type B testing of the emergency escape air lock. The proposed action would allow performance of alternative testing of the emergency escape air lock door seals following air lock leak rate testing.

The proposed action is in accordance with the licensee's application for exemption dated January 10, 1996, as supplemented February 20, 1997.

The Need for the Proposed Action:

The proposed action is necessary to allow the licensee to use different testing requirements for the emergency escape air lock. During special testing in 1992, the licensee showed that the annulus between the door seals could not be successfully tested without the door strongback installed even at pressures as low as 2 psig. This testing, along with information from the vendor, confirms that between-the-seal pressure testing on the emergency

escape air lock doors cannot be properly measured or evaluated if the door strongbacks are not installed. Similarly, the inner door does not fully seal with the reverse-direction pressure of a full air lock pressure test unless the strongback is installed.

Since the removal of the inner door strongback after pressure testing requires the outer door to be opened, a between-the-seals test of the outer door would be required by the regulation. This test would require the installation of a strongback on the outer door. Further, full pressure testing or the pressure induced by the strongback may cause the door seals to take a set. It is therefore necessary to open both doors (one at a time) after any pressure testing to ensure full seal contact, and there is a potential need to readjust the seals to restore seal contact. Option A of Appendix J requires a leak rate test after opening an air lock door, with the idea that the door opening is a relatively isolated event. In this case, requiring another test immediately after a valid test simply because the door was opened again to remove test equipment or to perform seal adjustment would require performance of another air lock leak rate test to comply with the regulation. In this case, compliance with the rule would lead to an infinite series of tests.

Environmental Impacts of the Proposed Action:

The Commission has completed its evaluation of the proposed action and concludes that the proposed exemption would not increase the probability or consequences of accidents previously analyzed and the proposed exemption would not affect facility radiation levels or facility radiological effluents. As an alternative to the final pressure test required by Appendix J for verification of door seal functionality, the licensee has proposed a final door seal contact verification. This seal performance verification is

completed following the full pressure air lock test, after the removal of the inner door strongback, and just prior to final closure of the air lock doors. The requested exemption would not affect compliance with the present requirement to perform a full pressure emergency escape air lock test at 6-month intervals. It would also not affect the requirement to perform a full pressure emergency escape air lock test within 72 hours of opening either door during periods when containment integrity is required. The seal contact check replaces the pressure test required by Appendix J for the door opening(s) and/or seal adjustments associated with test restoration.

The change will not increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released off site, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed exemption.

With regard to potential nonradiological impacts, the proposed action does involve features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect nonradiological plant effluents and has no other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed action, any alternatives with equal or greater environmental impact need not be evaluated. As an alternative to the proposed action, the NRC staff considered denial of the proposed action. Denial of the application would result in no change in current environmental

impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statement for Palisades dated June 1972.

Agencies and Persons Consulted:

In accordance with its stated policy, on June 23, 1997, the NRC staff consulted with the Michigan State official, Dennis Hahn, of the Michigan Department of Environmental Quality, Drinking Water and Radiological Protection Division, regarding the environmental impact of the proposed action. The State official had no comments.

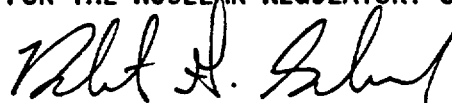
FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letters dated January 10, 1996, and February 20, 1997, which are available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room located at the Van Wylen Library, Hope College, Holland, Michigan 49423.

Dated at Rockville, Maryland, this 23rd day of June, 1997.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert G. Schaaf, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation