



April 6, 2004

10 CFR 50.55a

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

Palisades Nuclear Power Plant  
Docket 50-255  
License No. DPR-20

Proposed Use of Subsequent ASME Code Edition and Addenda for Inservice Testing

Consumers Energy, the previous licensee for Palisades Nuclear Plant, submitted a relief request on March 13, 1998, requesting approval to use the 1995 American Society of Mechanical Engineers (ASME) Operation and Maintenance (OM) Code, OMa-1996, Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light Water Reactor Power Plants," as an alternative to the requirements of the 1989 ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWF-5000, paragraph IWF-5300, "Inservice Examinations and Tests." By letter dated December 28, 1998, the Nuclear Regulatory Commission (NRC) approved the relief request on an interim basis until the final rule was published.

Subsequently, Nuclear Management Company, LLC (NMC) confirmed that the NRC's approval of the March 13, 1998, relief request ended when the final rule was published on September 22, 1999. Therefore, in accordance with 10 CFR 50.55a(f)(4)(iv), NMC requests approval for use of the 1995 ASME OM Code, OMa-1996, Subsection ISTD at the Palisades Nuclear Plant. This request is provided as Enclosure 1.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments.

for  
Daniel J. Malone  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

Enclosure (1)

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC

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ENCLOSURE 1  
PROPOSED USE OF SUBSEQUENT ASME CODE EDITION AND ADDENDA  
FOR INSERVICE TESTING

**ASME CODE COMPONENTS AFFECTED**

The affected components are Palisades Nuclear Plant's American Society of Mechanical Engineers (ASME) Code Class 1 and 2, safety related dynamic restraints (snubbers) used in systems required to perform a specific function in shutting down the reactor to a safe shutdown condition, maintaining the safe shutdown condition, or mitigating the consequences of an accident.

**APPLICABLE CODE EDITION AND ADDENDA**

The applicable code edition is the 1989 ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWF-5000, paragraph IWF-5300, "Inservice Examinations and Tests," which states, "Inservice examinations shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4, (published in 1988), using the VT-3 visual examination method described in IWA-2213."

However, Nuclear Management Company, LLC (NMC) remained on the previously approved alternative examination requirements at Palisades Nuclear Plant, subsequent to the final rule being published. The testing requirements of the 1995 ASME Operation and Maintenance (OM) Code, OMa-1996, Subsection ISTD are conservative in relation to the 1989 edition of the ASME Code, Section XI, paragraph IWF-5300.

**PROPOSED SUBSEQUENT CODE EDITION AND ADDENDA**

The proposed subsequent code edition and addenda is the 1995 ASME OM Code, OMa-1996, Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light Water Reactor Power Plants."

**RELATED REQUIREMENTS**

The portion of the 1995 ASME OM Code, including the 1996 Addenda (ISTD), has been incorporated by reference in 10 CFR 50.55a (reference 64 FR 51370). Therefore, there are no related requirements.

**DURATION OF PROPOSED REQUEST**

The proposed request would remain in effect until the Nuclear Regulatory Commission (NRC) approves the Palisades' Fourth Inservice Testing Interval Code update. NMC plans to submit the proposed update to the NRC in March 2006.