



March 23, 2005

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

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

Request for Clarification of Inservice Testing Interval for Certain Relief Valves RE:
Relief Requests 28, 30 and 31

- References: 1) *Letter from Consumers Energy to NRC, "Submittal of Revised Inservice Testing Valve Relief Request Numbers 30 & 31," dated July 24, 1997*
- 2) *Letter from Consumers Energy to NRC, "Response to Request for Additional Information – Valve Relief Requests 28, 30, 31, and 32," dated September 29, 1997*
- 3) *Letter from NRC to Consumers Energy, "Staff Review of Requests for Relief from Certain Pump and Valve Inservice Testing Requirements at the Palisades Plant (TAC NOS. M98923, M98924, M99344, and M99650)," dated March 6, 1998*

By letters dated July 24, 1997 (Reference 1) and September 29, 1997 (Reference 2), Consumers Energy, the previous licensee for the Palisades Nuclear Plant, submitted multiple relief requests, including valve relief request (VRR) No. 28, VRR No. 30, and VRR No. 31. The Nuclear Regulatory Commission (NRC) approved the relief requests by letter dated March 6, 1998 (Reference 3).

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Nuclear Management Company, LLC, (NMC), the current licensee, is requesting the NRC to clarify statements made in the safety evaluation (SE) in Reference 3. Specifically:

VRR No. 28 – “RV-0402, RV-0403, RV-0954, RV-0955, and RV-2109 will be removed and set point tested at least once every 10 years.”

VRR No. 30 – “Therefore, a maximum set point test interval of 10 years is acceptable for RV-0401.”

VRR No. 31 – “A maximum set point interval of 10 years is acceptable.”

NMC has extended the Palisades Nuclear Plant Inservice Testing (IST) Program, third 10-year testing interval from August 21, 2005, to March 24, 2006, in accordance with the American Society of Mechanical Engineers (ASME) Code, Section XI, 1989 Edition, Subsection IWA-2430(e). This extension recaptured the 215-day extended outage in 2001 to repair the control rod drive mechanisms. Questions have been raised as to whether the extension for the specified relief valves is acceptable based on the language in the SE. Therefore, clarification is needed on whether or not the Code-allowed interval extension is acceptable, due to the “10 year” condition in the SE.

Summary of Commitments

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

W. [Signature] for DAN J MALONE

Daniel J. Malone
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