

September 15, 2005

LICENSEE: Nuclear Management Company, LLC

FACILITY: Palisades Nuclear Plant

SUBJECT: SUMMARY OF A TELEPHONE CONFERENCE CALL HELD ON AUGUST 17, 2005, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION (NRC) AND NUCLEAR MANAGEMENT COMPANY, LLC, (NMC) CONCERNING DRAFT REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO THE PALISADES NUCLEAR PLANT LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission (NRC) staff (the staff) and representatives of Nuclear Management Company, LLC (NMC) held a telephone conference call on August 17, 2005, to discuss and clarify the staff's draft request for additional information (D-RAI) concerning the Palisades Nuclear Plant license renewal application. The conference call was useful in clarifying the intent of the staff's D-RAI.

Enclosure 1 provides a listing of the meeting participants. Enclosure 2 contains a listing of the D-RAI discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA Samson Lee For/
Michael J. Morgan, Project Manager
License Renewal Section A
License Renewal and Environmental Impacts Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Docket No.: 50-255

Enclosures: As stated

cc w/encls: See next page

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DISTRIBUTION: Summary of telephone conference held on August 17, 2005 with NMC,
Dated: September15, 2005

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TO DISCUSS THE
LICENSE RENEWAL APPLICATION
AUGUST 17, 2005**

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**DRAFT REQUESTS FOR ADDITIONAL INFORMATION (D-RAI)
PALISADES NUCLEAR PLANT
LICENSE RENEWAL APPLICATION
AUGUST 17, 2005**

The U.S. Nuclear Regulatory Commission staff (the staff) and representatives of Nuclear Management Company, LLC, (NMC) held a telephone conference call on August 17, 2005, to discuss and clarify the staff's draft request for additional information (D-RAI) concerning the Palisades Nuclear Plant license renewal application (LRA). The following D-RAIs were discussed during the telephone conference call.

D-RAI 2.3.3.7-1

LRA Section 2.3.3.7, on Page 2-114, states that the boundaries of the portions of the Fire Protection System within the scope of license renewal include 5 legs that tap off the fire main loop to supply various sprinkler systems, deluge systems and hose stations within the auxiliary building, turbine building, intake structure, and hydrant stations.

LRA Section 2.1.1.1 identifies the current licensing basis as a plant information source for license renewal. The current licensing basis for fire protection is contained in the PNP fire hazards analysis (FHA), 10 CFR 50 Appendix R analysis and fire protection safety evaluation reports.

License renewal Drawing LR216, Sheet 2, shows fire hose stations FHS 1, FHS 6, FHS 2 and FHS 4 (Locations F-3 and F-4) as outside the scope of license renewal. Based on the information available in the PNP current licensing basis, the staff cannot determine if these fire hose stations should be excluded from the scope of license renewal.

In order for the staff to complete its review, provide the fire area and the room number in which these fire hose stations are located. Justify the exclusion of these fire hose stations from the scope of license renewal in accordance with the requirements of 10 CFR 54.4(a)(3).

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-2

The current licensing basis for the fire protection, "Plant Fire Hazards Analysis, Fire Area 14, Reactor Containment," under manual suppression states that two hose reels are provided near areas of combustibles inside containment. Also, the fire protection safety evaluation report dated September 1, 1978, Section 4.3.1.4, "Interior Hose Stations," states that, "The licensee has proposed to provide hose stations inside the containment to be supplied by the existing service water system."

However, license renewal Drawing LR216, Sheet 2, shows the fire hose reel stations 37 and 38 (Locations C-2 and D-2) inside the containment, which are supplied by the Service Water System (SWS), as outside the scope of license renewal. Although license renewal Drawing LR208, Sheet 1b, shows service water to the fire hose reel stations symbols (Location D-6) as within the scope of license renewal, two fire hose stations are shown on this drawing as outside the scope of license renewal. Further, LRA Section 2.3.3-12 for the SWS does not address the

above-mentioned fire hose reel stations. LRA Section 2.3.3-12 describes the Appendix R function but does not include Criterion 3 for these hose stations.

Based on the information available in the current licensing basis, the staff cannot determine if the containment fire hose stations should be excluded from the scope of license renewal. Justify the exclusion of the containment fire hose stations from the scope of license renewal in accordance with the requirements of 10 CFR 54.4(a)(3) or revise the subject drawing and LRA accordingly.

Discussion: The applicant indicated that the requested information is available and that the subject reel stations were missing as a result of a drawing error. The drawing will be corrected and forwarded to the reviewer. Therefore, this question is WITHDRAWN and will not be sent as a formal RAI.

D-RAI 2.3.3.7-3

The PNP Plant Fire Hazards Analysis (FHA) Report, Section II, "Definitions," states that a fire area, as used in Appendix R, is defined as an area sufficiently bounded to withstand hazards associated with the area and, as necessary, to protect important equipment within the area from fire outside the area. The FHA report describes Fire Areas 1 through 19 and 21 through 36. Each fire area evaluation contains a section, "Fire Barriers Defining the Areas." These fire barriers are included in the current licensing basis and are within the scope of license renewal. Fire Area 9, "Screen House (Intake Structure)," describes "A radiant energy shield wall and a horizontal distance of at least 20" separates one diesel fire pump from the others..."

LRA Section 2.3.3.7 of the fire protection system states, "The Fire Protection System (FPS) includes the diverse design and operational features intended to prevent and mitigate the effects of fires. Building structures have been designed and arranged to prevent the spread of fire and to ensure integrity of redundant safe shutdown systems and areas."

LRA Section 2.4.7, "Intake Structure," lists building framing-concrete, below grade (wall, foundation, slab, grout, reinforcement, trenches, cable pits, tunnels, etc.) as a component group subject to an Aging Management Report (AMR). Although fire barrier is identified as one of intended functions for this component group, based on review of the above LRA sections it is not clear that all fire barriers and the radiant energy shield wall in the screen house (intake structure) described in the Fire Hazards Analysis (Fire Area 9) are included within the scope of license renewal.

Confirm that all fire barriers and components such as, doors, dampers and penetration seals described in the plant FHA report are included within the scope of license renewal or provide information to describe why any of the fire barriers or the radiant energy shield are excluded from the scope of license renewal.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-4

The current licensing basis for fire protection is contained in the Plant Fire Hazards Analysis (FHA) Report, 10 CFR 50 Appendix R analysis, and fire protection safety evaluation report (SER). The plant FHA describes Fire Areas 25A, South Heating Boiler Room, and 25B,

North Heating Boiler Room, located in the turbine building elevation 590'. The fire hazards analysis describes each of these rooms as being protected by automatic wet pipe suppression systems.

License renewal Drawing LR216, Sheet 2, depicts sprinkler systems in the following areas as outside the scope of license renewal: boiler rooms, office (elevation 607'), cold chemical and IC labs (elevation 590'), office (elevation 590') at Location F-7, maintenance storage (elevation 590'), and tech and maintenance office (elevation 590').

Provide the basis for excluding the sprinkler systems for the above-mentioned rooms from the scope of license renewal or revise the license renewal drawings accordingly.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-5

LRA Section 2.4.3, on Page 2-225, System Function Listing, S0100-FP, has a comment that containment exterior wall is an Appendix R fire barrier. However, LRA Table 2.4.3-1 does not include fire barrier/protection as an intended function.

Provide information to clarify that Table 2.4.3-1 does not need to describe fire protection as an intended function, or revise the table to define fire protection as an intended function.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-6

LRA Section 2.4.6 for the feedwater purity building, on Page 2-234, states that the water purity building is within the scope of license renewal based on fire protection requirements to achieve safe shutdown. It also states that, on Page 2-235, the feedwater purity boiler room in the south end of the building houses a diesel fuel oil transfer pump and piping, and this is the only area in this structure that is within the scope of license renewal. Further, the system function S0800-FP, on Page 2-235, states that the building provides structural and/or functional support to fire protection-related components. However, LRA Table 2.4.6-1 does not identify fire protection/barrier as an intended function.

Provide information to clarify that fire barrier is not an intended function for the feedwater purity building, or revise Table 2.4.6-1 to define fire barrier as an intended function.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-7

LRA Section 2.4.10 of the turbine building, on Page 2-251, states that the turbine building also contains fire barrier concrete commodities credited in fire protection requirements for achieving safe shutdown. Further, the system function listing, on Page 2-252 states that this section includes fire protection as one of the functions. However, LRA Table 2.4.10-1 does not include fire protection as an intended function. Provide information to clarify that fire barrier is not an intended function for the turbine building, or revise Table 2.4.10-1 to define fire barrier as an intended function.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-8

License renewal Drawing LR216, Sheet 2, shows valves (RW506, RW508, RW510, RW500, RW502, RW504, RW507, RW509, RW511, RW501 and RW503), at Locations E/F-3 and F-4, as outside the scope of license renewal. These valves appear to be normally closed drain valves to permit removing fire protection water that is discharged into the charcoal filters. These valves appear to be isolation boundary valves. The staff cannot determine from the information available if these valves should be excluded from the scope of license renewal. (NOTE: The drain destination DDWT does not appear on Drawing LR200, Revision 1 as a “drain”).

Further, the Palisades Fire Protection Safety Evaluation Report (SER), dated September 1, 1978, Section 4.3.1.7 states that, “In areas protected by automatic sprinkler and water spray systems, floor drains have been sized to remove fire protection water.” Fire protection SER Section 4.5 states that floor drains are provided in areas protected by fixed water suppression systems.

In order for the staff to complete its review, provide additional information to demonstrate that the charcoal filter drains should not be included within the scope of license renewal or revise the drawing accordingly.

Discussion: The applicant indicated that the requested information is available and that the subject items were missing as a result of a drawing error. The drawing will be corrected and forwarded to the reviewer. Therefore, this question is WITHDRAWN and will not be sent as a formal RAI.

D-RAI 2.3.3.7-9

The following components are shown on the fire protection license renewal drawings as within the scope of license renewal. However, LRA Table 2.3.3-7 of the fire protection system does not list these components as being subject to an AMR. These components serve a pressure boundary intended function, and are passive and long-lived. Clarify if these components are included in Table 2.3.3-7 as part of any other component group. If not, justify the exclusion of these components from being subject to an AMR in accordance with the requirements of 10 CFR Part 54.21(a)(1).

- a. Fire hydrants, fire hose racks, and fire hose stations on LR216, Sheets 2 and 3, at multiple locations.
- b. Vacuum air release valves on LR216, Sheet 1, at Locations C-4, F-3, and G-5.
- c. A restrictive orifice on LR216, Sheet 1, at Location E-1.
- d. Flexible connections on LR216, Sheet 1, at Locations B-4, C-4, and E-5.
- e. A spray nozzle on LR216, Sheet 2, at Location B-2.
- f. Lube oil coolers on LR216, Sheet 1, at Locations B-4 and F-5.

- g. T-108A/B/C on LR214, Sheet 4 at Location C-5 and T-108D, on LR214, Sheet 5 at Location D-6.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI 2.3.3.7-10

LRA Section 2.3.3.7, on Page 2-115 states that the portions of the Fire Protection System containing components subject to an AMR include accumulators, filters, strainers, sprinkler heads, fasteners, drip pans, oil closures, pipe and fittings, pumps and valves. However, drip pans and oil enclosures are not listed in LRA Table 2.3.3.7-1 as component groups subject to an AMR. Clarify this discrepancy.

Discussion: The applicant indicated that the requested information is located in the stated LRA table and the component is listed as “accumulators/piping”. Therefore, this question is WITHDRAWN and will not be sent as a formal RAI.

D-RAI 3.3.2.7-1

The PNP fire hazards analysis (FHA), in fire area 9 screen house (intake structure), describes, “A radiant energy shield wall separates one diesel fire pump from the others...” Table 3.5.2-8 of the LRA does not specifically identify radiant energy shields, but references carbon steel fire barriers in the auxiliary building, intake building and containment. It is unclear what these metal barriers are and what their function is. Table 3.5.2-8 references the Fire Protection Program, Section B2.1.10, as the aging management program addressing these barriers. However, Section B2.1.10 does not specifically address radiant energy shields, and refers to the Structural Monitoring Program, Section B2.1.19 for fire barriers, such as walls, floors, and ceilings. Identify where the radiant energy shields referenced in the FHA are included in the AMR and which program manages their aging effects. Also verify that the Table 3.5.2-8 should include a reference to the Structural Monitoring Program, Section B2.1.19 for these barriers or identify where in the Fire Protection Program, Section B2.1.10 they are addressed.

Discussion: The applicant indicated that the question is clear. This D-RAI will be sent as a formal RAI.

D-RAI B2.1.10-1

Section B2.1.10 of the LRA describes the aging management program for fire protection and identifies three exceptions to the NUREG-1801 XI-M26 Program, “Fire Protection Program.” However, these exceptions do not list any exceptions with the frequencies of surveillance of the structures, systems and components identified as being in scope and requiring aging management. Verify that no exceptions are taken from the surveillance frequencies identified in NUREG -1801 Fire Protection Program.

Discussion: The applicant indicated that they have verified that no exceptions are taken to the list program. Therefore, this question is WITHDRAWN and will not be sent as a formal RAI.