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**Consumers  
Power  
Company**

**COPY**

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

August 31, 1979

Mr James G Keppler  
Office of Inspection and Enforcement  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - IE BULLETIN 79-14

Attached please find Consumers Power Company's response to item 2 of IE Bulletin 79-14 (Seismic Analyses for As-Built Safety-Related Piping Systems).

David P Hoffman (Signed)

David P Hoffman  
Assistant Nuclear Licensing Administrator

CC: Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement

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SEISMIC ANALYSIS  
FOR  
AS-BUILT SAFETY RELATED PIPING SYSTEMS  
FOR  
PALISADES NUCLEAR PLANT  
CONSUMERS POWER COMPANY

1. INTRODUCTION

USNRC Bulletin 79-14 dated July 2, 1979, including Revision 1, dated July 18, 1979, requested information be provided within 30 days of July 2, 1979. The Consumers Power Company (CPCo) response was provided by letter from D. P. Hoffman to J. G. Keppler dated August 1, 1979.

Additionally, the bulletin requested results of inspection be provided within 60 days of July 2, 1979. The CPCo response is contained in the following sections.

2. STATUS OF INSPECTION

An estimated 20,000 feet total of piping is involved in the inspection. Approximately half of the piping is not accessible, i.e. inside containment or in areas of relatively high radiation.

As of August 22, 1979, the following points are noted with respect to status:

- °Some 18 personnel are devoted at the Palisades site to the effort. This force will be increased to about 40 in the near future.
- °Approximately 2100 feet of pipe and about 220 related supports have been inspected.
- °The majority of the piping inspected is associated with the chemical and volume control; the safety injection, containment spray and shutdown cooling; and the component cooling water systems.

3. RESULTS OF INSPECTION

The general results of the inspection completed to date are favorable. Specific results have been reviewed and categorized as significant or minor. The following points are noted.

- a. The only inspection finding deemed significant was the condition of snubber #33. For this unit we found a deformed support to which the snubber was attached. Licensee Event Report LER-79-033 further describes the observed deficiency and the completed corrective action.

b. A number of minor conditions have been identified by the inspection. In general, the plan is to return the noted conditions to the original condition within 30 days of detection or verify that the existing condition does not degrade the system. Examples of the minor conditions are as follows:

°Loose or missing nuts and bolts

°Variations between existing support and the drawing for the support

°Drawings cannot be located for all supports

°Bent rods or struts

°Minor pipe geometry differences