



**Consumers  
Power  
Company**

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COPY

April 8, 1980

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 - RESPONSE TO  
IE INSPECTION REPORT 80-02

Consumers Power Company's response to the alleged infraction noted in IE  
Inspection 80-02 dated March 6, 1980 is as follows:

Item

10 CFR 50, Appendix J, Section IV.A requires, in part "...replacement of a component which is part of the primary reactor containment boundary,...shall be followed by a Type A, Type B, or Type C test, as applicable...."

Contrary to the above, the licensee periodically removes a pipe cap on the containment pressure instrument lines to test and calibrate the pressure transmitters and switches. Although the pipe cap is part of the primary containment boundary, no leak test was performed after replacement of the cap following instrument testing on June 5 and on July 2, 1979. The reactor was operated at power after both tests.

Response

Corrective Action Taken and Results Achieved - The subject instrument line is presently being modified (described in the next section), therefore, eliminating any corrective action to the system as it was found during the inspection.

Corrective Action Taken To Avoid Further Noncompliance - Figure 1 (attachment) illustrates the penetration of the containment pressure instrumentation as it existed during the subject inspection. The procedure used to calibrate this

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instrumentation didn't require leak testing the cap on the instrument line upon completion of the calibration.

To avoid further noncompliance, the existing instrument lines are being modified as shown in Figure 2 (attachment). This modification will be completed prior to start-up. The new instrument line system provides double isolation (Valves V-18MC and V-18MD normally closed) prior to the test connection cap. This eliminates the cap from the containment pressure boundary system and the need for any type of leak test upon completion of calibrating the pressure transmitters. The subject procedure (RI-6) has been revised to accommodate these changes and will be implemented prior to start-up.

Date When Full Compliance Will Be Achieved - As stated above, the instrument line modification will be completed prior to start-up and the procedure implementation will be prior to start-up.

We recognize the need to leak test caps or plugs when they are part of the primary boundary between containment and the outside atmosphere (eg, when leakage through the cap or plug would represent a direct path between containment and the outside atmosphere). In cases where the cap or plug is not part of the primary boundary we do not consider the provisions of 10 CFR 50 Appendix J Paragraph IV.A to apply.

David P Hoffman (Signed)

David P Hoffman  
Nuclear Licensing Administrator

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

Attachment Figures 1 and 2

PENETRATION NO. 48 - CONTAINMENT PRESSURE INSTRUMENTATION  
EXISTING

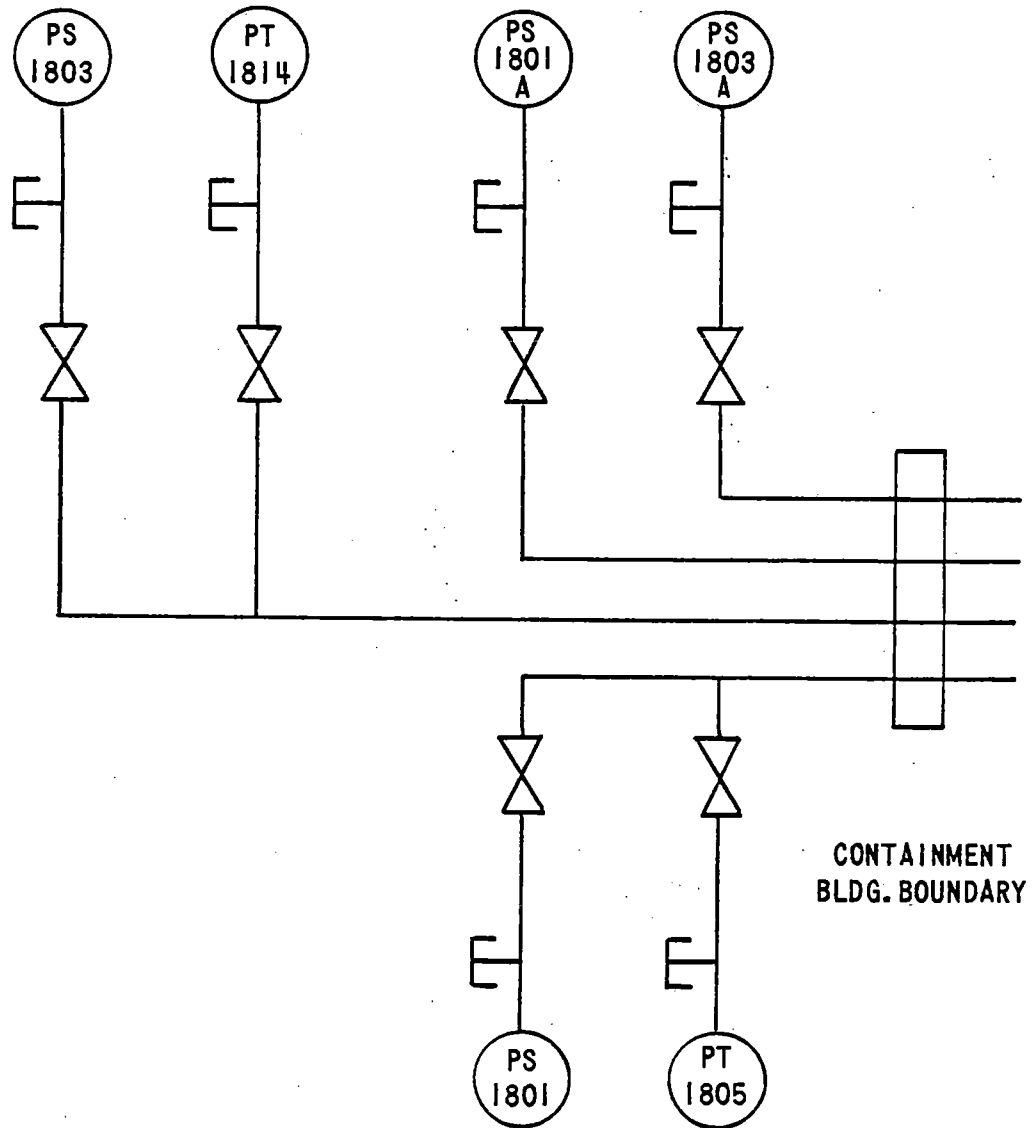


FIGURE 1

PENETRATION NO. ● - CONTAINMENT PRESSURE INSTRUMENTATION  
PROPOSED

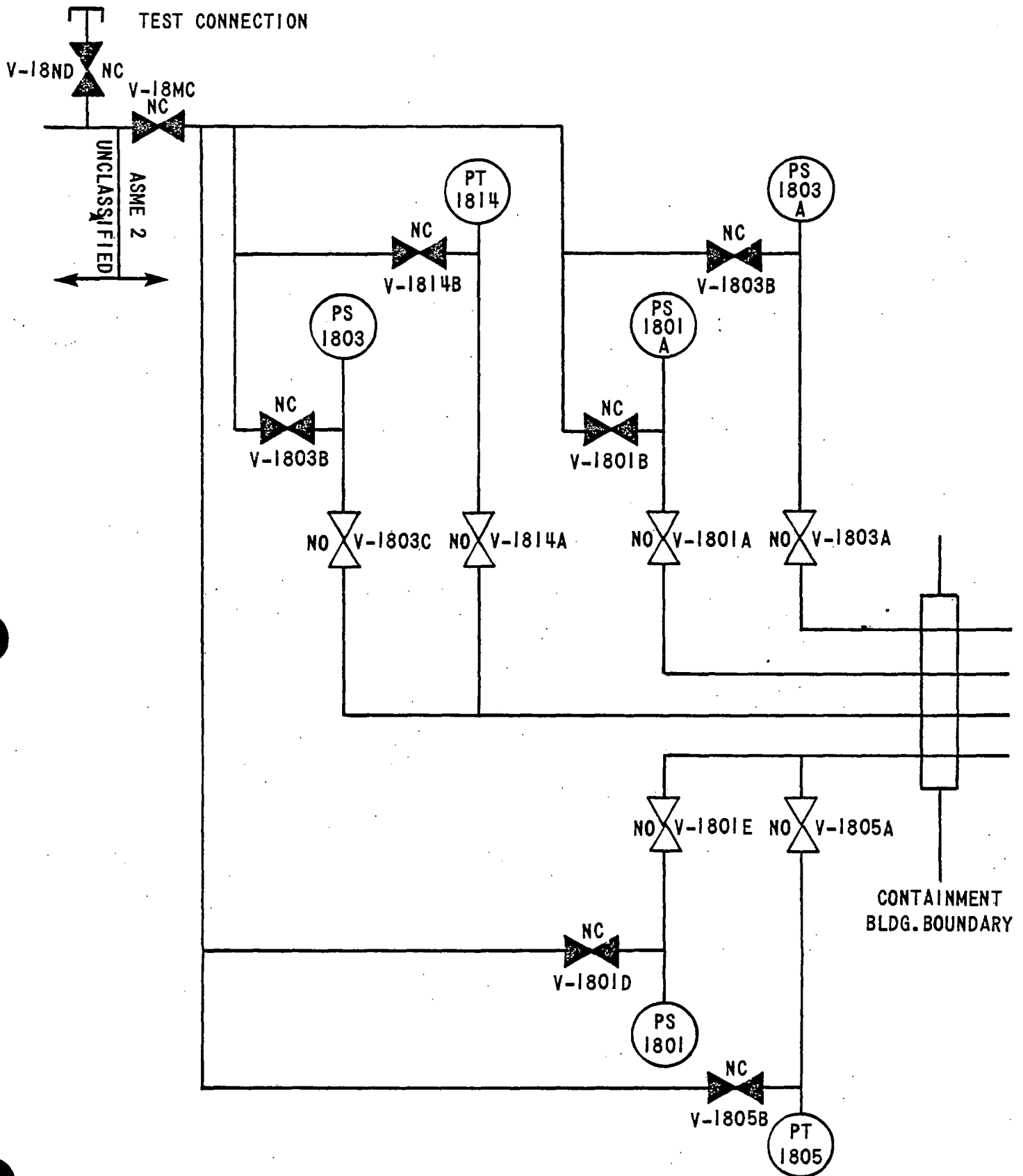


FIGURE 2