



**Consumers
Power
Company**

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

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Director, Nuclear Reactor Regulation
Att Mr Dennis M Crutchfield, Chief
Operating Projects Branch No 5
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES
PLANT - COMMENTS REGARDING IMPLEMENTATION
OF NUREG 0578 "LESSONS LEARNED" ITEMS

Consumers Power Company representatives and the NRC TMI "Lessons Learned" team met at the Palisades Plant on January 17 and 18, 1980 to discuss and review documentation of the implementation of "Category A" Lessons Learned requirements.

Based on that meeting and Consumers Power Company submittal dated March 4, 1980, the NRC staff concluded that the implementation of the "Category A" requirements at the Palisades Plant was acceptable. (Reference NRC letter dated April 6, 1980.) A review of the April 6, 1980 NRC letter revealed that a few of the items need to be corrected. The following is intended to clarify those items:

2.1.1 Emergency Power Supplies

The second and third sentences (quoted below) should be deleted.

"On a SIAS the heaters normally powered by the 1D (Safety related) bus are automatically shed, however, they can be manually reloaded on the 1D bus from the control room. The 750 KW of heater capacity normally powered from the 1E (non safety related) bus would continue to be energized on SIAS as long as offsite power is available."

In actuality the safety injection signal (SIS) results in lockout of all pressurizer heaters (both 152-305 and 152-211 are tripped) until SIS is reset. This feature was incorporated into the control scheme for the heaters as part of the "submerged electrical equipment modifications" performed during the 1978 refueling outage.

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2.1.3a Direct Indication of PORV and Safety Valve Position for PWR and BWRs

The valve position instrumentation qualification program has been developed to meet IEEE-323-1974 which includes the 40-year aging test. Therefore, the test program will not be completed before the end of the year. A realistic date for receipt of the final report on the test program is July 1981. Please refer to the B&W document entitled "Valve Monitoring System Seismic and Environmental Test Program" with its attached program schedule (submitted by B&W TMI Owners' Group).

2.1.4 Containment Isolation

The last sentence of the second paragraph should read: "In the meantime, the licensee has committed to manually isolate the containment upon receipt of a safety injection signal, and primary system pressure drops below 1250 psig." (Addition underlined.) Refer to Consumers Power Company letter dated August 10, 1979 which made this commitment.

2.1.5c Recombiner Procedures

The last sentence of the second paragraph should read: "Controls for operating the recombiners are located inside the cable spreading room."



David P Hoffman
Nuclear Licensing Administrator

CC JGKepler, USNRC
NRC Resident Inspector-Palisades