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October 31, 1980

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - CONTAINMENT AIR LOCK TESTING

On July 30, 1976, a meeting was held with Consumers Power Company (CP Co) and NRC representatives to discuss a proposed exemption to 10 CFR Part 50, Appendix J. In that meeting we requested an exemption from portions of Appendix J which requires the personnel containment air lock doors to be tested after each opening and proposed to test the air lock doors once per six months regardless of how many times they are opened.

The following discussion is the basis for our September 27, 1976 request. The Palisades Plant first went critical in April 1971. Since that time there has been no damage observed to the rubber seals or stainless steel sealing surfaces around the air lock doors. The original personnel containment air lock door gaskets are still in use and are performing their design function.

Our personnel containment air lock doors were manufactured by W J Wooley Company and were designed to contain a pressure of 55 psig. These doors have been pressure tested and contained 63 psig (the most restrictive accident analyzed for the Palisades Plant is the main steam line break where the peak containment pressure will be less than 55 psig). Our particular air lock design has two gaskets per door while only one gasket is needed to seal a penetration. This design provides four gaskets (seals) total (2-doors) between the inside of containment and the outside, any one of which would provide the necessary integrity.

The air lock doors are considered to be part of the containment isolation system; therefore, our present Technical Specifications require them to be pressure tested (55 psig) every six months provided containment isolation was necessary during that period.