

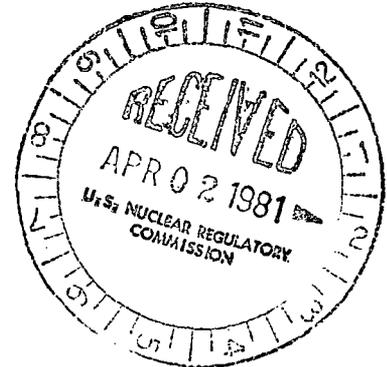


Consumers
Power
Company

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March 31, 1981

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 -
RESOLUTION OF PALISADES PLANT -
INOPERABLE SNUBBER OPERATION

IE Inspection Report 80-15 dated September 24, 1980 identified two items of noncompliance. Consumers Power Company's response to those items of noncompliance was submitted to you on October 17, 1980. In our response to Item 1, we took exception to the NRC interpretation of the Palisades Plant Technical Specifications for snubber operation.

By letter dated January 9, 1981, Region III stated that following reevaluation of their position, they considered their initial interpretation of Palisades Technical Specification 3.20.1 to be correct.

Since this problem could not be resolved between Region III and Consumer Power Company, we requested that this matter be formally reviewed with the Office of Nuclear Reactor Regulations (NRR). On March 27, 1981, a conference call was made between the NRC (NRR and Region III) and Consumers Power Company. The individuals involved were Messrs D C Boyd (Region III), T V Wambach (NRC), S R Frost (CP Co), R W Montross (CP Co), G H R Pettijean (CP Co), H J Palmer (CP Co) and B D Johnson (CP Co).

As a result of that conference call, it was agreed that Palisades Plant will operate under the following agreement pertaining to snubber operability until our Technical Specifications can be officially changed.

"During all modes of operation, except cold shutdown or refueling, with one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system."

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Palisades Plant
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An engineering evaluation with respect to inoperable snubbers, as agreed upon by Mr T V Wambach (NRR) and Mr S R Frost (CP Co) is as follows:

If an inoperable snubber has not been subject to a seismic event, a "lockup" failure or some other transient such as a water hammer (starting from the time the snubber was declared inoperable), the engineering evaluation may simply document that none of the above-mentioned events have happened and no further analysis is required. In the case that one of these events should occur during the period of snubber inoperability, a more detailed evaluation will be performed on the support component to verify the extent of damage, if any.

This agreement will provide an interim solution to the inoperable snubber until the Palisades Plant Technical Specifications are approved.



David P Hoffman
Nuclear Licensing Administrator

CC Director, Region III, USNRC
NRC Resident Inspector-Palisades Point