



**Consumers
Power
Company**

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March 17, 1982

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Operation Reactor Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555



DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - SEP TOPIC IX-3, STATION SERVICE AND COOLING WATER SYSTEMS

By letter dated February 22, 1982, the NRC issued the final evaluation for SEP Topic IX-3 for the Palisades Plant. This evaluation raised an additional issue which had not previously been addressed within the SEP. This issue involves concerns about a loss of the service water pumps due to a passive failure which results either in flooding of the intake structure or spraying of the service water pump motors. Consumers Power Company has evaluated these concerns, and has concluded that some corrective action would be appropriate. We still consider the 1975 NRC conclusions to be valid, and the hazard due to flooding from pipe breaks in the intake structure to be minimal. Improvements are possible, however, with relatively minor actions. Since these actions represent improvements in the plant at a cost equivalent to additional analyses, these actions are clearly preferable.

Accordingly, Consumers Power Company proposes the following actions to resolve this final issue in Topic IX-3:

1. Intake structure drainage area will be verified to be adequate or increased if necessary to ensure that leakage from line cracks (as postulated by BTP MEB 3-1 - slot size 1/2 pipe diameter by 1/2 wall thickness) can be released without flooding the service water pump motors (preferably without operator action). Leak rates to be postulated using the criteria of MEB 3-1 would be approximately 800 gpm from the 90" cooling tower piping and 500 gpm from the 24" service water piping.
2. Devices will be added to provide a control room alarm to warn of intake structure flooding.
3. The combination of postulated leak rates and alarm level will be used to verify that operators have sufficient reaction time to prevent

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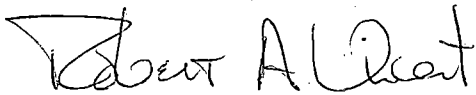
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flooding of the service water pumps if any operator action is determined to be necessary.

4. Some type of spray protection will be added over the service water pump motor ventilation louvres to minimize the effect of sprays from various sources in the vicinity.

It is expected that the above actions will be taken prior to completion of the 1983 Palisades refueling outage.



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