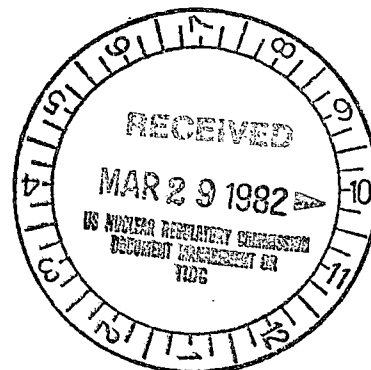




Consumers
Power
Company

General Offices: 212 West Michigan Avenue, Jackson, MI 49201 • (517) 788-0550
March 24, 1982



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

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

Consumers Power Company letter dated September 11, 1975 requested an exemption to 10CFR50, Appendix J, Section III.D.2. The exemption would remove the requirement that the personnel air lock be tested after each opening. NRC letter dated December 11, 1981, however, denied our request for an exemption and requested Consumers Power Company to submit the required Technical Specification modifications within 90 days.

Following receipt of the NRC letter dated December 11, 1981, Consumers Power Company initiated the appropriate action in order that Palisades could comply with the requirements of Appendix J to 10CFR50. This included a determination of the feasibility of performing a between-the-seals test of either air lock and the necessary modifications, repairs, and adjustments required to enhance successful performance of between-the-seals testing. An inspection by our air lock vendor determined what modifications would be required, and thus, the necessary parts and material were subsequently ordered. Consumers Power Company expects delivery of all the required equipment by May 7, 1982 and modifications to be completed within 30 days thereafter.

Consumers Power Company submittal dated March 3, 1982 provided our proposed Technical Specification change request as required by the NRC. NRC approval of the Technical Specification change request before the air lock modifications are completed would not subject Consumers Power Company to a state of noncompliance of our Technical Specifications. A full air lock penetration test will be performed within 72 hours after either each air lock door opening or the first of a series of openings. Although Consumers Power Company will comply with the Technical Specification change request when NRC approval is granted, a full air lock penetration test entails a considerable amount of time. In order to perform a full pressure test for the personnel air lock, entry through the emergency air lock is required to operate the equalizing valve for the personnel air lock inner door. Therefore, an opening of the personnel air

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Palisades Plant
Air Lock Leak Testing
March 24, 1982

2

lock would necessitate a full pressured test for both the personnel and emergency air locks. Based on previous maintenance and testing records we anticipate approximately 64 man-hours and an elapsed time of 36 hours will be required for the entire full pressure testing operation.

In summary, it is evident that compliance with the March 3, 1982 Technical Specification Change Request upon approval by the NRC and before the modifications are complete is possible but will require a large block of time on a weekly basis. The effort to make the modification in a timely manner is continuing but a rapid approval of the Technical Specification Change Request will not expedite the completion since the schedule is predicated on equipment delivery.



Brian D Johnson
Senior Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

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2

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