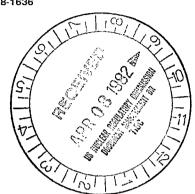


David J VandeWalle
Nuclear Licensing Administrator

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-1636

April 5, 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 - TMI ACTION PLAN ITEM II.D.1, RELIEF AND SAFETY VALVE TESTING

Consumers Power Company was requested by a letter from the NRC dated September 29, 1981 to submit a statement confirming the adequacy of safety and relief valves at the Palisades Plant, based on our preliminary review of the generic test program results. Consumers Power Company is a participant in the Generic PWR safety and relief valve test program implemented by the Electric Power Research Institute. The purpose of this letter is to provide the necessary confirmation of the adequacy of safety and relief valves at our Palisades Plant.

The primary objective of the Test Program was to provide full scale test data confirming the functionability of primary system power operated relief valves and safety valves for expected operating and accident conditions. The second objective of the program was to obtain sufficient piping thermal hydraulic load data to permit confirmation of models which may be utilized for plant unique analysis of safety and relief valve discharge piping systems. Relief Valve tests were completed in August 1981 and safety valve tests were completed in December, 1981. The reports prepared by EPRI documenting the Test Program results are as follows:

- o "Valve Selection/Justification Report"

 This report documents that the selected test valves represent all participating PWR plant safety and relief valves.
- o "Test Condition Justification Report" and the report entitled "Combustion Engineering Valve Inlet Fluid Conditions for Pressurizer Safety and Relief Valves in Combustion Engineering Designed Plants"

 These reports document the basis and justification of the valve test conditions for all participating PWR plants.

DMCrutchfield, Chief Palisades Plant TMI Action Plan Item II.D.1 April 5, 1982

- o "Safety and Relief Valve Test Report"

 This report provides evidence demonstrating the functionability of the selected test valves under the selected test conditions for all participating PWR plants.
- O "Discharge Piping Load Model Report
 This report presents an analytical model benchmarked against test
 data that may be used for plant unique analysis of safety and relief
 valve discharge piping systems.

All of these documents were transmitted to Harold Denton of the NRC by letter dated April 1, 1982 from David Hoffman of Consumers Power Company on behalf of the participating PWR Utilities.

Consumers Power Company has performed a preliminary review of the Test Program results. Based on the review, we have concluded that valves tested represent the safety and relief valve designs and that the conditions tested envelop the range of expected operating and accident conditions for Palisades. Also, these Reports provide the evidence required by NUREG 0737, Item II.D.1.A which will be used to perform the final plant specific evaluations.

The September 29, 1981 letter requested that plant specific final evaluations be submitted by July 1, 1982. In order to meet that date, evaluations have been initiated. Depending on the outcome of the evaluations, it may be necessary to continue the evaluation beyond July 1, 1982. If a longer evaluation period is required you will be notified on or before July 1, 1982.

David J VandeWalle

Nuclear Licensing Administrator

vid J. VandeWall

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