



**Consumers
Power
Company**

David J VandeWalle
Nuclear Licensing Administrator

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

April 26, 1982



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

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - STEAM GENERATOR TUBE INSPECTION

The purpose of this letter is to document conclusions reached during recent discussions with you and members of the NRC staff regarding actions which Consumers Power Company plans to take prior to returning the Palisades Plant to service. Palisades is currently in an unplanned outage which was necessitated by a primary to secondary leak of less than about 0.3 gpm. Details of the nature of the leak have been discussed with the staff and will be provided in writing at a later date.

The conclusions reached during this meeting are as follows:

1. Consumers Power Company will conduct additional eddy current testing of steam generator tubes with both the 540 SFW probe and the 4 x 4 probe in steam generator A only. These additional tube inspections will be performed on a random sample basis such that the total number of tubes inspected, including those already inspected during this outage, equals 9% of the total number of unplugged tubes in steam generator A. Inspections with the 540 SFW probe will include the straight portion of the hot leg and both the first and second U-bend of each tube selected. With the 4 x 4 probe only the straight section of the hot leg will be inspected.

For the purpose of this examination, a "defective" tube will be defined as a tube containing a defect similar to that found on the two tubes which have been identified as the leaking tubes. The criteria used to determine whether or not to inspect additional tubes will be those found in Section 4.4.6.2 of NUREG-0212 "Standardized Technical Specification for Combustion Engineering Plants" (Revision 2 dated Fall 1980). Decisions concerning the plugging or increased inspection due to excessive wastage will be determined by criteria presented in the Palisades Technical Specifications.

*Appl
5/1/82*

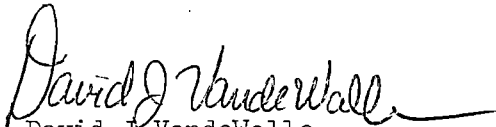
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Steam Generator Tube Inspections
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2. Consumers Power Company commits to place an administrative limit on allowable primary to secondary leakage which is more restrictive than that presently allowed by Technical Specification 3.1.5.d. The new limit will permit leakage of no more than 0.1 gpm for any period of steady state operation greater than 24 hours and will be imposed through a Standing Order to plant operations personnel. A copy of the proposed Standing Order is enclosed.
3. Following the current outage, all Licensed Operations personnel will be rebriefed in the proper response to steam generator tube leaks and tube ruptures prior to or while first serving on shift with the plant at or greater than hot standby.

If, following completion of the inspection program as described above, no additional defective tubes have been identified, Consumers Power Company at that time will commence efforts to return the Palisades Plant to service. A report containing eddy current testing results and our conclusions regarding the nature of the two defects found in steam generator A will be supplied to the NRC within sixty days following startup of the plant.


David J. VandeWalle
Nuclear Licensing Administrator

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

To Duty and Call Superintendents, Palisades
Shift Technical Advisors, Palisades
Shift Supervisors, Palisades
Control Room, Palisades

STANDING ORDER NO. 41
Rev 0

FROM ^{UBS} Operations Superintendent, Palisades

DATE April 22, 1982

SUBJECT PALISADES PLANT -
PRIMARY TO SECONDARY LEAK RATE CRITERIA
FOR REMAINDER OF CYCLE 5

CONSOLIDATED
POWER
COMPANY

INTERNAL
CORRESPONDENCE

CC WFMullins, Palisades
NWBough, Palisades
DWetzel, P-11-030A
File 950/22*08*08/L

APPROVED

[Signature]
Plant Manager

Based upon our recent problem with tube leaks in A Steam Generator, there is a need to provide more restrictive controls over the allowable primary to secondary leak rates than allowed by Technical Specification 3.1.5. These shall be in effect for the remainder of Cycle 5.

The following requirements are specified:

IMMEDIATELY COMMENCE A CONTROLLED PLANT SHUTDOWN IF THE TOTAL PRIMARY TO SECONDARY LEAK RATE EXCEEDS 0.1 GPM FOR ANY PERIOD OF STEADY-STATE OPERATION GREATER THAN 24 CONSECUTIVE HOURS.

IN ADDITION, DURING PERIODS OF STARTUP AND MAJOR LOAD CHANGES, WHEN THE LEAKAGE MEASUREMENT SENSITIVITY IS REDUCED, A CONTROLLED PLANT SHUTDOWN SHALL BE COMMENCED IF THE TOTAL PRIMARY TO SECONDARY LEAK RATE EXCEEDS 0.6 GPM FOR ANY PERIOD GREATER THAN 24 CONSECUTIVE HOURS.

If any single leak rate determination exceeds the applicable criteria specified above, the Duty and Call Superintendent shall be immediately notified and the on-shift Chemist shall be contacted to begin increased surveillance as specified by the Chemistry/Health Physics Superintendent.