



**Consumers
Power
Company**

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

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

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PALISADES PLANT - REQUEST FOR AN EXEMPTION FROM 10 CFR 50 APPENDIX J
III.B.2 FOR THE PERSONNEL AIR LOCK EQUALIZING VALVES

Title 10 CFR 50 Appendix J III.B.2 requires that all Type B tests are to be performed at a pressure of not less than P. Consumers Power Company requests an exemption from the above requirement for the personnel air lock equalizing valves. Specifically, the containment-side door equalizing valve. A vacuum decay type test instead will be used to determine leakage rate.

Currently, the equalizing valves of both air lock doors are tested as a result of the full personnel air lock leak rate test. For the equalizing valve on the containment-side door, the top and bottom plate sections of the valve are clamped together during the test to compress the double O-rings and thus create the seal. The C-clamp is required to protect this equalizing valve from damage due to the 55 psig test pressure acting on the bottom of the valve. For this valve, the test pressure during the full air lock test is opposite in direction to the "accident" pressure, thus, the use of C-clamps is justified. However, the "C" clamp also artificially maintains the valve closed so that the adjustment of the valve mechanism/linkage itself can not be tested during the full personnel air lock leak rate test. Clamping the equalizing valve also increases the possibility of O-ring damage.

Consumers Power Company proposes to revise the existing method of testing the equalizing valves so that the C-clamp would not be required during any test. For the full personnel air lock leak rate test, this would be accomplished by capping the containment-side door equalizing valve pipe stub prior to the test. After the full air lock test is completed, the equalizing valve would be tested separately using a vacuum pump connected to the equalizing valve pipe stub. This would provide for a leak rate test with the pressure differential in the same direction as in the case of the "accident" condition.

The vacuum test would be performed on the containment-side door equalizing valve whenever the full air lock test is performed and could also be used to test either of the equalizing valves after replacing O-rings or adjusting valve linkage.

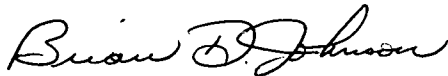
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Title 10 CFR 50 Appendix J III.B.2 requires a minimum test pressure of P_a , which is 55 psig. This is not achievable for vacuum decay type tests. However, extrapolation of the vacuum decay to a pressure differential of 55 psig can be performed to give an equivalent leakage rate at 55 psig.

Based on the above information, Consumers Power Company believes the proposed method for determining the leakage rate of the equalizing valves is equivalent in results to current methods. We would appreciate the granting of the exemption as soon as possible.



Brian D Johnson
Staff Licensing Engineer

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