



**Consumers
Power
Company**

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April 30, 1984

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

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - NUREG-0737 ITEM III.D.1.1 - INTEGRITY OF SYSTEMS OUTSIDE
CONTAINMENT

In response to NUREG-0737 Item III.D.1.1 "Integrity of Systems Outside Containment Likely to Contain Radioactive Material For PWRs and BWRs," Consumers Power Company implemented a program designed to reduce leakage from systems outside of containment to as-low-as practical levels. Letters were submitted to the NRC dated December 27, 1979; March 4, 1980 and December 19, 1980 describing these programs. A request for a change to the Palisades Plant Technical Specifications was submitted to the NRC on November 12, 1981. The change request provided a preventative maintenance program to reduce leakage in systems outside containment. Also, the current Palisades Technical Specifications (Section 6.15 "Systems Integrity) provide administrative control of the program.

Another phase of the leakage reduction program dealt with several modifications designed to prevent the unnecessary contamination of certain systems. The Engineered Safeguards Room sump pump discharge lines were modified and operating procedures were developed to allow the safe return of the sump pump discharge back into containment. After successful implementation of the leakage reduction program, it is now considered undesirable to return sump pump effluents back into containment, which would require the re-opening of the containment isolation valves. Therefore, a modification will be made to render the sump pumps inoperative upon receipt of a

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containment isolation signal. Consequently, any system leakage will be retained in the Engineered Safeguards Room sump well and will not be introduced into the normal liquid radwaste processing systems. Consumers Power Company will revise the appropriate operating procedures to reflect these changes.



Brian D Johnson
Staff Licensing Engineer

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