



**Consumers  
Power  
Company**

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

May 14, 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 - HYDROTEST RELIEF REQUEST

Attached is Consumers Power Companys' Relief Request pursuant to ASME B & PV Code Section XI 77 s78 that relieves the Palisades Plant from performing a hydrostatic test on the modification that altered the feedwater piping such that the auxiliary and main feedwater now flow through separate piping and separate nozzles into the steam generators.

In four (4) previous situations in which the feedwater system has been cut into, an inservice leak test for preservice acceptance had been utilized in lieu of a hydrotest. In this case Consumers Power Company performed a fabrication/installation acceptance and preservice inspection consisting of 100% radiography and an initial service leak test with acceptance by the State Boiler Inspectors in lieu of a hydrotest. We are submitting this relief request in accordance with Palisades Technical Specification 4.3.b.

Palisades is presently repairing and modifying the auxiliary feedwater line and it is our request that the attached relief request also covers this modification, in that, relief from the hydrotest is being sought for the same reasons.

Brian D Johnson  
Staff Licensing Engineer

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

Attachment

8405210322 840514  
PDR ADQCK 05000255  
P PDR

*A047*  
*11*

OC0584-0010A-NL02

ATTACHMENT

Consumers Power Company  
Palisades Plant - Docket 50-255

HYDROTEST RELIEF REQUEST

May 14, 1984

2 Pages

CONSUMERS POWER COMPANY  
PALISADES NUCLEAR POWER PLANT  
SYSTEM PRESSURE TEST RELIEF REQUEST

SYSTEM

Auxiliary Feedwater System (Aux FWS)

CODE CLASS

2

REQUIREMENT

During the 1981 outage, Consumers Power Company, Palisades Nuclear Power Plant altered the feedwater piping such that the auxiliary and main feedwater piping now flow through separate piping and separate nozzles into the steam generators. ASME B&PV Code Section XI, 77S78, IWA-5214 and IWC-5210(a)(2) notes that a hydrostatic test is required and IWC-5222(a) incidates 1.25 Psv for altered portions of a system. Also, IWA-5214(c) notes that where altered components are isolable, only that portion need be pressure tested.

BASIS FOR RELIEF

For the Palisades auxiliary feedwater piping, the installation welds are not isolable from the secondary side of the steam generators. Palisades Technical Specifications permit a total of eight hydrostatic tests (1250 psia, no temperature specification) in the projected 40 year life. One hydro is to be conducted every 10 years; one hydro was performed for construction acceptance. Technical Specification requirements therefore account for a total of five of the available eight hydros. The current alteration is the fourth time the feedwater system has been cut into since plant start-up. Each previous occasion has utilized an inservice leak test for preservice acceptance (in conjunction with NDE). This alteration will utilize a 100% RT PSI. It is considered that the remaining three available hydros should be withheld for contingencies or water hammer consideration.

Performing the required hydrostatic test on the feedwater piping subsequent to the modification would be extremely difficult, expensive and impractical due to the following additional items:

1. The inability to maintain pressure due to potential leakage through the feedwater isolation valves, main steam isolation valve and other valves connected to the system.
2. Additional time and effort to pin and block the main steam constant support and variable spring hangers.

3. Potential for placing excess stress on the steam generator shells.
4. Potential for damage to system instrumentation, or considerable time delay due to additional efforts required to isolate or remove instrumentation.
5. Potential for damage to the main steam system and its hangers due to static loads caused by water solid condition.
6. Potential for damage to the steam generator tube bundles.
7. Isolation and preparation of the system would result in additional radiation exposure to personnel.
8. In addition to the foregoing, the alternate examinations specified below will provide a level of confidence and quality equal to or better than the required testing per ASME Code.

#### ALTERNATE EXAMINATIONS

Based on the above considerations, CPCo has performed a fabrication/installation acceptance and preservice inspection consisting of 100% radiography (RT) and an initial service leak test in lieu of a hydro.

#### IMPLEMENTATION

The alternate examinations were performed in accordance with approved written procedures using qualified personnel after the system alteration and before the system was declared operable.

#### DRAWINGS

Bechtel M101-2937(a), Rev 8  
Bechtel M101-2936(a), Rev 7  
Palisades P&ID M207, Rev 44