



**Consumers
Power
Company**

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September 28, 1984

Director,
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - POST LOCA CONTAINMENT FLOODING LEVEL -
EEQ PROGRAM CORRECTION

A revision to the Palisades EEQ Program is necessary as a result of a recalculation of the containment flooding level following a LOCA event. NRC Safety Evaluation Report, dated June 1, 1981 for our Environmental Qualification of Safety-Related Electrical Equipment reflects a value provided by Consumers Power Company for maximum submergence levels. This value was previously specified as 6 feet above the containment basement floor (elevation 596 feet). The revised flooding level is 6'4" above the basement floor (elevation 596'4"). We have reviewed the effects of this additional 4" flooding level and concluded that the change does not affect the qualification status of any additional devices, nor will the raised level affect additional cable or splices. In addition, the change does not affect the existing justification for continued operation.

The impact of the revised flooding level is limited to editorial changes to our EEQ central files. Updating of these files is completed. The occurrence resulted from several non-conservative assumptions identified in the EEQ calculations including the fact that a $\pm 1\%$ tolerance is permitted by the calibration procedures for instruments effecting containment water level and the 3 feet that the containment radius is reduced at the 590 level was also neglected.

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