



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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December 23, 1986

Director,
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US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
ADDITIONAL EVALUATION OF THE USE OF A HPSI PUMP FOR
APPENDIX R SAFE SHUTDOWN - FIRE PROTECTION

Consumers Power Company letter dated October 4, 1985 stated that the exemption request for the charging pump room regarding the separation criteria of 10CFR50 Appendix R was no longer necessary because, for a worst case fire in the 590' elevation corridor of the Auxiliary Building, high pressure safety injection (HPSI) pump P-66B is redundant to the charging pumps. A description of the model used in the analysis showing that redundancy was included as Attachment A to the October 4, 1985 letter. In a July 22, 1986 submittal, Consumers Power Company notified the NRC that since NRC review of the HPSI redundancy analysis was not completed, the exemption request regarding Appendix R separation criteria for the charging pump room was considered to be active.

Subsequently, on August 20, 1986, Consumers Power Company and NRC staff met to discuss the HPSI redundancy analysis and the methodology described in Consumers Power Company's October 4, 1985 submittal. At that meeting, the NRC staff informed Consumers Power Company that the analysis used an improperly benchmarked computer code and that HPSI pump redundancy to the charging pumps should be re-analyzed using a properly benchmarked computer code or by using other methodology.

Consumers Power Company has performed the re-analysis using a hand calculation and the appropriate conservatisms. Attachment No. 1 to this letter provides the revised analysis. Appropriate modifications and/or procedure changes to ensure the post-fire capability to operate the containment spray pump and HPSI pump in tandem will be implemented and the exemption request regarding

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separation in the charging pump room will be withdrawn after the revised analysis is approved by the NRC.



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Attachment