



Consumers  
Power

**POWERING  
MICHIGAN'S PROGRESS**

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July 13, 1987

Nuclear Regulatory Commission  
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
RESPONSE TO INSPECTION REPORT 87-014

NRC Inspection Report dated June 11, 1987 transmitted one Notice of Violation and requested a written response. This violation involves the classification (ie, active versus passive) and testing, per ASME Boiler and Pressure Vessel Code, Section XI, for the Containment Hydrogen Monitoring System Isolation Valves. Our written response to this violation is as follows:

Response:

Violation (255/87014-01) (DRP)

As a result of the inspection conducted on May 5 through June 1, 1987 and in accordance with the General Policy and Procedures for NRC Enforcement Actions (10CFR Part 2, Appendix C), the following violation was identified.

10CFR50.55a(g)(4)(ii) requires that inservice tests to verify operational readiness of valves whose function is required for safety shall comply with the applicable Section XI edition of the ASME Boiler and Pressure Vessel Code. Section XI of the ASME Boiler and Pressure Vessel Code, Article IWV-3400, requires valve exercising tests to be performed on active Category A valves as defined in IWV-2000. Article IWV-3300 requires valve position indicator verification. The eight containment isolation valves (SV 2412 A&B, SV 22413 A&B, SV 2414 A&B, SV 2415 A&B) for the Hydrogen Monitoring System are active Category A valves.

Contrary to the above, the eight containment isolation valves for the Hydrogen Monitoring System neither had been tested nor had position indicator verifications performed as required by the Code since construction of the system in 1984.

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Corrective Actions Taken and Results Achieved

Since system construction in 1984, isolation valves; SV 2412 A&B, SV 2413 A&B, SV 2414 A&B and SV 2415 A&B for the redundant supply and return lines, associated with the containment hydrogen monitoring system, were classified as "passive" valves and tested in accordance with 10CFR50, Appendix J requirements. Although classified as passive, present testing methodology encompasses all the ASME Code Section XI requirements with the exception of Article IWV-3413. This article requires recording stroke time. Thus all applicable testing requirements except valve stroke time have been and are being met. Since the subject valves are solenoid actuated, their stroke time is typically less than one second and stroke time can seldom be used to monitor valve condition. A tabulation of the ASME Section XI testing requirements and how they are met follows:

<u>Requirement</u>	<u>Consumer Power Company Test</u>
IWV-3300-Valve position remote indication required once every two years	DW-01 - Performed on a daily basis
IWV-3412-Valve exercising to full function position required once every quarter	DW-01 - Performed on a daily basis
IWV-3420-Exercising tests on category A valves to verify seat tightness required every two years	RO-32 Performed once every two years

All containment isolation valves, currently classified as "passive" were reviewed against applicable ASME Code Section XI requirements to determine if any additional valves may be subject to reclassification. None were found to require a change. Applicable procedures implemented by the Inservice Test (ISI) program have been reviewed to identify necessary revisions for the reclassification of the containment hydrogen monitoring system isolation valves as active.

Corrective Actions To Be Taken To Avoid Further Noncompliance

During the procedural review to identify necessary revisions, it was determined the Engineering Manual, governing the ISI program and quarterly valve test surveillance procedure, needs revision to incorporate the sole testing requirement not currently governed by procedure, Article IWV-3413. This article requires the recording of solenoid valve stroke times (typically less than one second) during testing.

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After procedure revisions, the surveillance test will be performed at its next regularly scheduled interval.

Date When Full Compliance Will Be Achieved

Necessary procedural revisions will be completed by August 1, 1987. The surveillance testing will be performed by the end of September 1987.

*Kenneth W Berry*

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