



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

May 17, 1988

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
INSERVICE VALVE TESTING PROGRAM UPDATE

Attached is a copy of Palisades Engineering Manual Procedure EM-09-02, Rev 12, "Inservice Testing of Plant Valves." This document is submitted in accordance with the requirements of 10CFR50.55a. It revises and supersedes the same procedure submitted in our December 1, 1987 letter.

The changes to this document are listed as follows. Step 5.1.4 has been revised to require submittal of all new relief requests to the NRC within 60 days as defined in the step. In Attachment 1, consistency is provided between the safety field of this table and the Palisades Equipment Data Base. Cold shutdown testing basis No. 20 (Attachment 3) and special clarifications 1 through 5 (Attachment 5) have also been added to this revision. Finally, a relief request for two check valves in the CCW system is added to Attachment 4.

The 60 day requirement for new relief request submittals is a result of a Palisades corrective action. The concern of this document is the possibility of administering a program which includes relief requests not submitted to the NRC. Under the new requirements Palisades will fulfill its responsibility of submitting all relief requests in a timely manner for NRC review.

Attachment 1 revisions are primarily editorial in nature. There has been an attempt to make this attachment consistent with the plant equipment data base safety fields. Revision to this attachment are designated by margin bars.

Finally, relief request No. 13 is added to this procedure. Check valves CK-CC401 and CK-CC402 are part of the component cooling system which provides pump cooling water to the safety injection pumps. These valves are identified on plant piping and Instrument Diagram M-209, Sh 2, Area C7. They must pass flow to ensure the operability of the safety injection pumps. This is demonstrated by Surveillance Procedure QO-19. Also, in order to assure the

OC0588-0007-NL04

8805240191 880517
PDR ADOCK 05000255
P DCD

A047
1/1

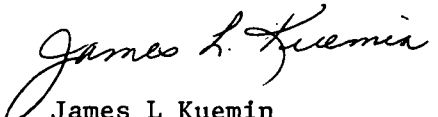
Nuclear Regulatory Commission
Palisades Plant
Inservice Valve Testing Program Update
May 17, 1988

2

operability of the component cooling system, back leakage through these valves must not diminish the CCWs ability to meet its required cooling loads. In order to assure this, control valves CV-0913 and CV-0950 are normally closed. Additionally, an acceptable test per QO-15, "Component Cooling Water Pumps," assures the CCW system can meet all of its cooling demands required by the FSAR Chapter 9. Therefore, further testing is not required to demonstrate the safety positions of CK-CC401 or CK-CC402.

Consumers Power Company requests NRC review of all the enclosed relief requests pursuant to 10CFR50.55a(g)(6)(i).

As was described in our December 1, 1987 letter a previous application fee of \$4000.00 was submitted. Therefore no application fee is accompanying this submittal.


James L Kuemin
Staff Licensing Engineer

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

Attachment