Consumers Power
POWERING MICHIGAN'S PROGRESS
General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

January 11, 1989

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
CONTAINMENT AIR ROOM - 10CFR50 APPENDIX R - EXEMPTION REQUESTS

Consumers Power Company (CPC) letter dated October 4, 1985 requested an exemption from the separation criteria of 10CFR50 Appendix R, Section III.G.2 for postfire safe shutdown instrumentation located in the Containment Air Room. During subsequent discussion with the NRC staff, it was determined that if a method to attain safe shutdown was possible without use of instrumentation located in the Containment Air Room, an exemption in regard to safe shutdown after a fire in the Containment Air Room may be allowed.

Revision 1 of the Palisades Emergency Operating Procedures (EOPs) was issued during August 1988 and contains procedures intended for application when all containment instrumentation is inoperable. Thus, use of the Palisades EOPs to attain safe shutdown after a worst case Containment Air Room fire is appropriate. However, since this use of the EOPs may be considered an alternate shutdown method and the PCS status indications obtained by using these procedures are not direct reading, an exemption to 10CFR50 Appendix R Section III.L.2 is required. Further, since there is no fixed fire suppression in the Containment Air Room, an exemption to 10CFR50 Appendix R, Section III.G.3 is also required. This approach to compliance has been discussed with the NRC Palisades Project Manager and has been reviewed by the NRC technical staff as a manner in which to bring the Containment Air Room into compliance with Appendix R. Contingent on the approval of the two exemptions discussed above, this letter withdraws our October 4, 1985 exemption request regarding separation criteria in the Containment Air Room.

For safe shutdown after a worst case fire in the Containment Air Room, the operator could, since he might have erratic or no direct indication of pressurizer level, pressurizer pressure, and steam generator pressure, enter EOP 1.0 and be guided through the Event Diagnostic Flow Chart and ONP 25.1 to Appendix G-1 of EOP 9.0 where possible contingency actions are listed. Attachment 1 to this letter contains the applicable pages of EOP 1.0, ONP 25.1 and Attachment G-1 of EOP 9.0.

OC1288-0250-NL04

A006
1/1

Therefore, pursuant to 10CFR50.12(a)(2)(ii), Consumers Power Company requests exemption from the direct reading requirement of 10CFR50 Appendix R, Section III.L.2.d and the fixed fire suppression requirement of 10CFR50 Appendix R, Section III.G.3 as they pertain to safe shutdown after a worst case fire in the Containment Air Room.

Richard W Smedley
Staff Licensing Engineer

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

Attachment

ATTACHMENT 1

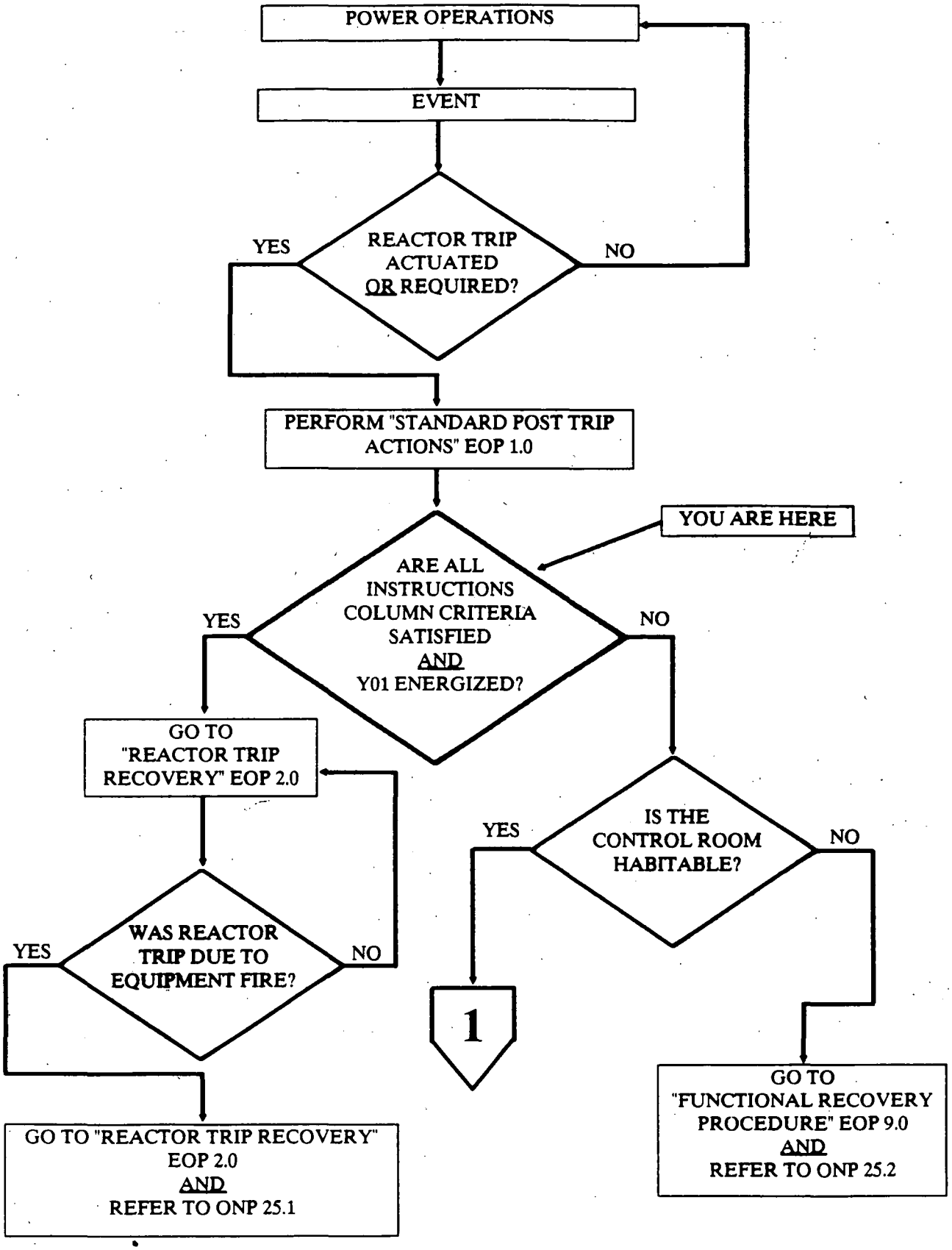
Consumers Power Company
Palisades Plant
Docket 50-255

APPLICABLE PROCEDURE PAGES FOR
PCS STATUS INDICATION DURING
CONTAINMENT AIR ROOM
POSTFIRE SAFE SHUTDOWN

January 11, 1989

5 Pages

EVENT DIAGNOSTIC FLOW CHART



TITLE: FIRE WHICH THREATENS SAFETY RELATED EQUIPMENT

CAUTION

Attachments 1 through 32 are NOT a 100 percent listing of equipment which may be affected by a fire in an area. They only reflect equipment required for safe shutdown.

4.4 Refer to appropriate Attachment(s) for the area(s) affected by the fire (Refer to Index). Attachments should be used to:

a. Identify equipment which may be affected.

b. Identify potential consequence of failure.

c. Identify possible alternative actions in response to Equipment failures.

NOTE: Fire damage may make some steps in procedures impossible. Attempts to meet the intent of those steps should be made with continuing use of applicable procedures.

NOTE: Fire damage to cables and control circuits may cause pumps to start or stop and valves to fail open or closed, regardless of normal failed position when de-energized.

4.5 a. If other procedures are in-use (eg, EOP 9.0), then some steps in those procedures may not be possible due to fire related damage. Attempt to meet the intent of affected procedure steps as completely as possible.

b. If a fire is detected or suspected in the Containment Building which causes a loss of Control Room instrumentation, then refer to attachment G-1 of EOP 9.0.

TCN-2-88-190

4.6 If a fire is detected or suspected in the following area(s), then secure the affected Train(s) of Control Room HVAC:

a. Control HVAC Duct Work

b. Electrical Equipment Room

c. Cable Spreading Room

d. Control Room HVAC Equipment Room (one for each Train)

e. Control Room

4.7 Maintain Plant in hot shutdown unless directed by the Shift Supervisor to commence a Plant cooldown. Equipment repairs may be necessary prior to cooling down.

ALTERNATE INSTRUMENTATION/CONTINGENCY ACTIONS FOR INOPERABLE INSTRUMENTATION LOCATED INSIDE CONTAINMENT

	SAFETY FUNCTION	INSIDE CONTAINMENT INSTRUMENT(S)	OUTSIDE CONTAINMENT ALTERNATE INSTRUMENT(S)	POSSIBLE CONTINGENCY ACTIONS
1.	Reactivity Control	a. All Rod Position Indications	None	Borate PCS per EOP 9.0 success path RC-2 OR RC-3
		b. All Reactor Power Instrumentation	None	Borate PCS per EOP 9.0 success path RC-2 OR RC-3
2.	Maintenance of Vital Auxiliaries-Electric	*	*	*
3.	PCS Inventory Control	a. All PZR Level Instruments	None	Maximize SI AND Charging flow per success path IC-2
		b. All Subcooling Indications	None	Assume PCS is at saturated conditions
		c. All HPSI Loop Flow Instruments	None	Use HPSI Discharge Pressure (**PI-0318/ **PI-0375) AND HPSI Delivery Curve to estimate HPSI flow
		d. All LPSI Loop Flow Instruments	**FT-0306 (Shutdown Cooling Flow)	Use **FT-0306 (Shutdown Cooling Flow) for indication of total LPSI flow
		e. All PZR Pressure Instruments	None	Use HPSI Discharge Pressure Indicators (**PI-0318/**PI-0375) AND Local Charging Pump Discharge Pressure (**PI-0212) to estimate PZR Pressure

* = Not Affected (ie, Instrumentation Located Outside Containment)

pa0386-0331GG89

ALTERNATE INSTRUMENTATION/CONTINGENCY ACTIONS FOR INOPERABLE INSTRUMENTATION LOCATED INSIDE CONTAINMENT

SAFETY FUNCTION	INSIDE CONTAINMENT INSTRUMENT(S)	OUTSIDE CONTAINMENT ALTERNATE INSTRUMENT(S)	POSSIBLE CONTINGENCY ACTIONS
4. PCS Pressure Control	a. All PZR Pressure Instruments	None	Refer to Item 3e
	b. All PCS Temperature Indications	None	Estimate PCS temperature by determining S/G pressure AND converting to corresponding saturation temperature as follows: i) IF MSIVs OR MSIV Bypass Valves open, THEN use **PI-0580 to estimate S/G pressure ii) Initiate Temporary Modification (Refer to Admin Procedure 9.31) to install pressure gauge to **P-8B Steam Supply Line Bleed Valve (**MV-MS500 for 'A' S/G OR **MV-MS500A for 'B' S/G)
	c. All HPSI Loop Flow Instruments	None	Refer to Item 3c
	d. All LPSI Loop Flow Instruments	**FT-0306 (Total Shutdown Cooling Flow)	Refer to Item 3d

* = Not Affected (ie, Instrumentation Located Outside Containment)

ALTERNATE INSTRUMENTATION/CONTINGENCY ACTIONS FOR INOPERABLE INSTRUMENTATION LOCATED INSIDE CONTAINMENT

	SAFETY FUNCTION	INSIDE CONTAINMENT INSTRUMENT(S)	OUTSIDE CONTAINMENT ALTERNATE INSTRUMENT(S)	POSSIBLE CONTINGENCY ACTIONS
5.	PCS/Core Heat Removal	a. All S/G Level Instruments	None	Maintain AFW Flow per EOP 9.0 success path HR-3
		b. All PCS Temperature Indications	None	Refer to Item 4b
		c. All Subcooling Indication	None	Refer to Item 3b
		d. All PZR Level Instruments	None	Refer to Item 3a
		e. All HPSI Loop Flow instruments	None	Refer to Item 3c
		f. All LPSI Loop Flow Instruments	**FT-0306 (Total Shutdown Cooling Flow)	Refer to Item 3d
6.	Containment Isolation	a. All Containment Radiation Instruments	None	Monitor Containment Pressure. IF Containment pressure is less than 1 psig, THEN potential for having high radiation levels in Containment is NOT likely.
7.	Containment Atmosphere	a. All Containment Temperature Instruments	None	Refer to Item 6a
		b. All Valve Position Indications for Containment Air Cooler SW Valves	Breaker Indications for Containment Air Cooler Fans	Use of Containment Spray Pumps as directed by EOP 9.0 success path CA-3
8.	Maintenance of Vital Auxiliaires Water	*	*	*
9.	Maintenance of Vital Auxiliaries Air	*	*	*

* = Not Affected (ie, Instrumentation Located Outside Containment)

pa0386-0331GG89