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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
CONFIRMATION OF CONFORMANCE WITH GENERIC LETTER 89-04 (TAC NO.74783)

Nuclear Regulatory Commission Generic Letter 89-04, Guidance on Developing Acceptable Inservice Testing Programs, dated April 3, 1989, approved all pump and valve Inservice Testing (IST) Programs and associated relief requests which were being reviewed by the NRC staff at the time Generic Letter 89-04 was issued. The approval was granted under the provision that licensees would review their most recently submitted IST Programs and implementation procedures against the NRC positions delineated in Attachment 1 of the Generic Letter and confirm in writing to the NRC conformance with the stated positions. This submittal confirms Palisades Plant commitment to conform with the Generic Letter 89-04 positions.

In accordance with the Generic Letter, a detailed review has been conducted of both the pump and valve Inservice Testing Programs. Palisades has concluded the pump test program meets the criteria of the Generic Letter with the exception of certain modifications which are planned to be completed. The valve test program review is not complete to the point where we can confirm conformance with the Generic Letter, however, it is our intent to complete the review and conform with the Generic Letter 89-04 positions.

For the pump test program, most of the modifications necessary for conformance will be completed during the October 1989 Maintenance Outage. The remainder will be completed during the 1990 Refueling Outage. At the completion of the October 1989 Maintenance Outage, ten of the eleven current Relief Requests will no longer be required. The remaining Relief Request will not be required after the 1990 Refueling Outage.

For the valve test program, the review to date has determined revisions are necessary to all program administrative and implementing procedures. Also, several potential equipment modifications have been identified and are being evaluated for implementation. Because of the volume of effort required, the time table of the Generic Letter will not be met. The required procedure

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revisions are divided into two categories; those which are required by expanded test scope or changed methodology (significant) and those which are not necessitated by change in test scope or methodology (insignificant). The insignificant procedure revisions will be completed in conjunction with each procedure's biennial review date with most being completed before exiting from the 1990 Refueling Outage. Significant procedure revisions will be completed as they are identified. Some of the modifications needed to bring the valve test program into conformance with the Generic Letter are to be completed during the 1990 Refueling Outage. The remainder will be delayed to the following refueling outage due to planning considerations.

In conclusion, Palisades believes the present IST programs meet the intent of the Generic Letter with the exceptions noted. Because of the volume of work remaining to be completed, alternative dates for completion of conformance to the Generic Letter 89-04 positions are proposed. This will allow the use of existing programs, thus reducing the possibility for errors which generally occur when taking extraordinary measures. Implementation of program changes with existing plant methods also results in a greater degree of quality in the finished products. Palisades proposed dates are as follows:

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| 1. Complete Pump Modifications | 1990 Refueling Outage |
| 2. Complete Valve Program Review and
Submit Revised Pump and Valve Programs to NRC | 12/31/89 |
| 3. Complete Insignificant Procedure Revisions | 10/09/91 |
| 4. Complete Valve Modifications | 1992 Refueling Outage |

While these dates do not meet the Generic Letter time table, they do provide achievable target dates for completion. Completion of these items by the noted target dates will have no detrimental affect on plant safety.

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