



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 17, 1990

Docket No. 50-255
Serial No. PAL-90-016

Mr. David P. Hoffman
Vice President, Nuclear Operations
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Hoffman:

SUBJECT: STEAM GENERATOR REPLACEMENT PROJECT (TAC 76069)

On August 1, 1989, Consumers Power Company (CPCo) met with the NRC staff to present preliminary plans for the replacement of the Palisades Plant steam generators. At that time, CPCo stated that the replacement project would not involve a change to the Technical Specifications or an unreviewed safety question; therefore, it was CPCo's intent to conduct the replacement pursuant to 10 CFR 59.59(a)(1) based on either a preliminary finding or the fact that other plants have made this determination. Additional discussions regarding the replacement project have taken place during periodic Management Meetings on September 28, 1989, February 13, 1990, and March 16, 1990, and at a meeting to discuss specifically the project on November 9, 1989. At each of these meetings, CPCo stated its intent to use the provisions of 10 CFR 50.59(a)(1). The nature of these meetings were such that only broad descriptions of various aspects of the project and its organization were discussed.

The staff has reminded CPCo that 10 CFR 50.59(b)(1) requires that written safety evaluations must be prepared providing the basis for the determinations that no unreviewed safety questions are involved. The staff is concerned, however, that technical issues could evolve which preclude the application of 10 CFR 50.59(a)(1). Therefore, we believe that CPCo should continue to meet with the staff to discuss, in detail, various aspects of the project, including the project plan.

A few of the areas for detailed discussion are known now, i.e. containment, narrow-gap welding, and ALARA considerations, but it is not possible to identify completely all such areas. To assist with this identification process, CPCo is requested to meet with the staff in the near future.

Issues which commonly have been addressed by other licensees undertaking steam generator replacement include but are not limited to the following:

1. The identification of safety-related equipment, systems, and components which may be affected by the replacement project,
2. The integrity of safety-related systems, and/or components which would be removed during the project, consideration of laydown loads and reinstallation of equipment following steam generator replacement,
3. The adequacy of cranes, rigging, and other equipment and components used for hoisting and removal/installation of components,

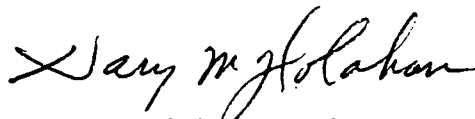
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4. The load path to be used for transport of the steam generators during removal and installation, including underpinning and shoring of existing floors,
5. The effect of any change in mass or center of gravity of the replacement steam generators on the seismic analysis for the containment structure and the NSSS,
6. The effect of steam generator design changes upon the analyses of all transients and accidents,
7. The method for storing the used steam generators,
8. The effect of reattachment of the steam generators upon primary coolant pressure boundary,
9. Radiological considerations (on-site and within containment) during and following the project, including environmental monitoring and
10. The effect of the access opening upon containment strength during all phases of the replacement project and upon the strength and integrity of containment following completion, including consideration of reinforcement, tendon and tendon duct replacement, and concrete age and strength effects.

Under 10 CFR 50.59, CPCo can proceed with the steam generator replacement project without prior Commission review or approval provided a determination is made (by CPCo) that no unreviewed safety question is involved and no change to a technical specification is required. The written safety evaluation(s) supporting your determination, as required by 10 CFR 50.59(b)(1), need not be submitted to the Commission. The staff, however may elect as part of our regulatory responsibility to examine selected portions or all of your safety evaluation. Completion of your 10 CFR 50.59 evaluation at the earliest possible time is crucial, if we are to avoid a potential delay in the project should a licensee amendment ultimately be required.

Sincerely,



Gary M. Holahan, Acting Director
Division of Reactor Projects - III, IV,
V & Special Projects
Office of Nuclear Reactor Regulation

cc:
See next page

Mr. Kenneth W. Berry
Consumers Power Company

Palisades Plant

cc:

M. I. Miller, Esquire
Sidley & Austin
54th Floor
One First National Plaza
Chicago, Illinois 60603

Nuclear Facilities and
Environmental Monitoring
Section Office
Division of Radiological
Health
P.O. Box 30035
Lansing, Michigan 48909

Mr. Thomas A. McNish, Secretary
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Judd L. Bacon, Esquire
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Jerry Sarno
Township Supervisor
Covert Township
36197 M-140 Highway
Covert, Michigan 49043

Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

Mr. Gerald B. Slade
Plant General Manager
Palisades Plant
27780 Blue Star Memorial Hwy.
Covert, Michigan 49043

Resident Inspector
c/o U.S. Nuclear Regulatory Commission
Palisades Plant
27782 Blue Star Memorial Hwy.
Covert, Michigan 49043

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Sincerely,

Original signed by

Gary M. Holahan, Acting Director
 Division of Reactor Projects - III,
 IV, V & Special Projects
 Office of Nuclear Reactor Regulation

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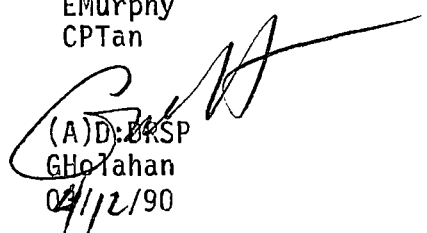
Docket File	NRC & Local PDRs	PD31 Reading	JZwolinski	ATHadani
MRSuttleworth	ADeAgazio	OGC	EJordan	KWichman
ACRS(10)	GBagchi	CYCheng	FCongel	
LCunningham	RHermann	RJones	LMarsh	
CMcCracken	FMiraglia	TMurley	EMurphy	
JPartlow	JRichardson	WRussell	CPTan	

*See previous concurrence

*PM/PD31:DRSP * (A)D/PD31:DRSP
 ADeAgazio JThoma
 03/22/90 03/22/90

*AD/PD31:DRSP
 JZwolinski
 03/17/90

(A)D:DRSP
 GHolahan
 03/12/90



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Sincerely,

Gary M. Holahan, Acting Director
 Division of Reactor Projects - III,
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 Office of Nuclear Reactor Regulation

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AdeAgazio	JThoma	JZwolinski	GHolahan
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The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance under PL 96-511 is not required.

Sincerely,

Gary M. Holahan, Acting Director
Division of Reactor Projects - III, IV,
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John Craig for
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