



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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Nuclear Regulatory Commission
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
SAFETY-RELATED PIPING REVERIFICATION PROGRAM -
PORV/BLOCK VALVE MODIFICATION AS-BUILT WALKDOWNS

Consumers Power Company letter dated January 10, 1990, presented the details of our reverification program for Safety-Related Piping 2- $\frac{1}{2}$ inches and larger. NRC letter dated March 21, 1990 provided that the program plan and schedule presented by Consumers Power Company was acceptable with exception of our exclusion of the piping associated with the PORV/block valve modification completed at the end of 1989. The following provides our justification for excluding this piping and our plans regarding walkdowns of the subject piping.

As presented in our January 10, 1990 submittal, the Safety-Related Piping Reverification Program will involve (1) physical walkdowns, (2) piping stress analysis reconciliation and verification, and (3) pipe support calculation reconciliation and verifications. The program is divided into two phases. Phase I represents a sample of piping selected to assure that primary coolant system (PCS) inventory is maintained, that PCS inventory can be borated to shutdown concentrations, and that redundant mechanisms exist to remove decay heat. The following piping systems or portions of piping systems are covered in Phase I:

9004250181 900412
PDR ADOCK 05000255
P PDC

OC0490-0322-NL04

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<u>System</u>	<u>Piping Linear Feet</u>	<u>Number of Hangers/Supports</u>	<u>Containment Inside (I)/Outside(O)</u>
ESS	947'	61	I
AFW	309'	24	I
AFW	737'	72	O
HPSI	206'	19	I
HPSI	265'	25	O
LPSI	586'	51	I
PCS (PORV)	<u>*693'</u>	<u>**86</u>	I
I Subtotal	2741	231	
O Subtotal	<u>1002</u>	<u>97</u>	
Total	<u>3745</u>	<u>328</u>	

* 152' of new pipe installed during PORV modification in 4th quarter, 1989 will not be reverified by walkdown during 79-14 reverification, but the analyses will be reverified.

** 33 supports installed or modified during PORV modifications in 4th quarter, 1989 will not be reverified by walkdown during 79-14 reverification, but the analyses will be reverified.

As indicated in the NRC's March 21, 1990 letter, one support was found to be missing after the modification was completed. This missing support, GC11-R854.1, was identified through preliminary walkdowns for the Safety-Related Piping Reverification Program, in order to assess scaffolding needs and ALARA planning for Phase I walkdowns.

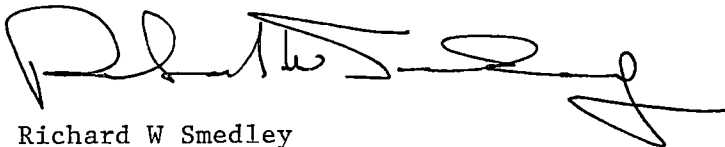
Six supports; GC11-R854.1, GC11-H850.1, GC11-H805.2, GC11-H862, GC11-H869.1 and GC11-H878.1 were not to be removed or modified as part of the PORV/block valve system modification. In these supports, GC11-R854.1, was mistakenly removed during the modification. Consequently, this support was replaced and inspected. The remaining five supports are scheduled to be walked down during the Spring 1990 Maintenance Outage.

At the time the PORV/block valve modification was in progress, NRC concerns over the adequacy of past 79-14 walkdowns were known. As such, additional emphasis was placed on accuracy of quality verifications during post modification inspections. While Consumers Power Company strongly believes the quality of post modification walkdowns performed is acceptable, we are planning to confirm the quality of post modification inspections through verification of the as-built condition of two supports associated with the PORV/block valve modification. The reverification will be performed by

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personnel performing independent quality walkdowns for the Safety-Related
Piping Reverification Program.

A handwritten signature in black ink, appearing to read 'Richard W. Smedley', written in a cursive style.

Richard W Smedley
Staff Licensing Engineer

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