

Docket
file



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

October 3, 1990

Docket No. 50-255

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

Dear Mr. Slade:

SUBJECT: CONSUMERS POWER COMPANY RESPONSE TO GENERIC LETTER 89-19 REGARDING
SAFETY IMPLICATIONS OF CONTROL SYSTEMS IN LWR NUCLEAR POWER
PLANTS (TAC NO. 74974)

By letter dated March 20, 1990, Consumers Power Company responded to Generic Letter 89-19, "Request for Action Related to Resolution of Unresolved Safety Issue A-47, 'Safety Implication of Control Systems in LWR Nuclear Power Plants' pursuant to 10 CFR 50.54(f)." In your letter, you stated that more detailed design studies and safety assessments must be completed before a decision can be made regarding implementation of a steam generator overfill protection system (SGOPS) at Palisades. This conclusion is based upon Palisades' specific evaluation of the probabilistic risk assessment performed, whereby you conclude that steam generator overfill would not be a dominant contributor to the overall risk of plant operation. Moreover, your letter stated that the appropriate framework to evaluate steam generator overfill events and the safety impact of implementing a steam generator overfill protection system is the Individual Plant Examination (IPE).

We do not agree with your position that a more detailed design and safety assessment using the IPE is an appropriate framework to continue the evaluation of steam generator overfill safety impacts. Previous NRC analyses performed to evaluate alternatives to resolve USI A-47, "Safety Implications of Control Systems", provided insight with respect to the safety benefits, impacts, and costs of modifications for overfill protection. Plant specific differences were considered in the development of NUREG-1218, "Regulatory Analysis for Resolution of USI A-47," and in the preparation of the Generic Letter 89-19. You had ample opportunity to provide comments on this issue when the Federal Register notice was published in May 1989.

Combustion Engineering (CE) plants, as a class, do not provide steam generator overfill protection. Overfill events have occurred at CE plants and other light water reactors. The consequences resulting from such events depend largely on piping system integrity, are difficult to model accurately, and have large uncertainties. It is for these reasons that IPE evaluation will not add significant information to close this issue. Further, we believe that the potential negative impacts of inadvertent isolation of feedwater can be made insignificant through sound design, with reliable equipment, and with implementation of a reasonable test strategy.

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Mr. Gerald B. Slade

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In regard to the implementation schedule for Palisades the staff is of the opinion that implementation of the SGOPS prior to the startup following the Cycle 10 refueling outage, which commences about February 1, 1992, is feasible. We request your response within 45 days from receipt of this letter.

Sincerely,



Robert C. Pierson, Director
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

cc: See next page

Mr. Gerald B. Slade

PALISADES

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-2-

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