Consumers Power
POWERING MICHIGAN'S PROGRESS
Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

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Nuclear Regulatory Commission
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
RESPONSE TO PROGRAMMED ENHANCEMENTS FOR GENERIC LETTER 88-17, "LOSS OF DECAY HEAT REMOVAL" FOR PALISADES PLANT - UPDATE

Nuclear Regulatory Commission (NRC) letter, dated July 17, 1990, discussed the review of all licensee responses regarding programmed enhancements as defined in Generic Letter (GL) 88-17, "Loss of Decay Heat Removal." In that letter NRC indicated concurrence with our proposed implementation schedule regarding the programmed enhancements identified for Palisades Plant. Included in the letter was a request to provide information on any significant changes to our estimated completion schedule and to provide the operational status of modifications performed as part of the programmed enhancements.

Provided below is an update of the current status of the programmed enhancements at Palisades.

In Consumers Power Company's (CPC) 60-day response (01/03/89) to Generic Letter 88-17, "Loss of Decay Heat Removal," we described our actions relating to the recommended expeditious actions identified in GL 88-17. In that response we provided details as to how training, procedures and administrative controls would be implemented to address each of the eight recommended expeditious actions.

In CPC's 90-day response (01/31/89) to GL 88-17, we described our actions relating to the programmed enhancements identified in GL 88-17. In that response we again provided details as to how training, procedures and administrative controls would be implemented to address the six recommended programmed enhancements.

The NRC's July 17, 1990 letter requested that CPC provide an update on the status of programmed enhancements that were not hardware dependent. All previously identified programmed enhancements that were not hardware dependent have been completed with the exception of a final Technical Specifications change. These completed programmed enhancements are:

1. Revision of the Primary Coolant System (PCS) level control and shutdown cooling system procedures to reflect use of the second PCS level indicator by the end of the 1990 Refueling Outage.

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2. Revision of the PCS level control and shutdown cooling system procedures to reflect restrictions on the Core Exit Thermocouple (CET) connection/disconnection when the head is installed/removed.

3. Revision of administrative procedures to improve procedural guidance for entry into and sustained reduced PCS inventory operation, reflect shutdown cooling equipment requirements and expanded guidance regarding the authorization of activities which may cause perturbations.

4. Revision of off-normal operating procedures to address the status of PCS on the loss of cooling capability, time available to the initiation of boiling and the make-up rate to the PCS to prevent the core from being uncovered.

5. Revision of system operating procedures which pertain to shutdown cooling equipment operation to enhance reliable system operation.

Our sixth and final programmed enhancement was made in a June 28, 1989 CPC submittal of a Technical Specification change request to add requirements for the shutdown cooling system. We are in the process of developing a revision to that previous change request to resolve NRC comments and other issues resulting from a plant corrective action document. This submittal will be made in the near future. As stated in our June 28, 1989 submittal, permanent resolution of the High Pressure Safety Injection (HPSI) pump operability issue (HPSI pump availability within 30 minutes for inventory additions to the primary coolant system (PCS) whenever the PCS water level is in a reduced inventory operating condition) will be delayed until our submittal of the Palisades Restructured Standard Technical Specifications.

Finally, under the heading of "Instrumentation" in the 90-day response, CPC committed to install a second Primary Coolant System (PCS) level indicator prior to the end of the 1990 Refueling Outage. The second level indicator and associated transmitter (LIA 0106 and LT 0106) have been installed in the PCS. The level indicator and its attendant instrumentation have been satisfactorily tested. The equipment is operational and we must only verify the PCS leak tight connections when the PCS hydrostatic test is completed, thus documenting the complete operability of the modification.

In summary, CPC has completed all the actions required by GL 88-17, with the exception of a final technical specification change and resolution the HPSI pump operability issue.

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