



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

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General Manager

March 13, 1991

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
REVISED INSERVICE TESTING OF PLANT VALVES PROGRAM

Consumers Power Company letter dated October 2, 1989 confirmed to the NRC our intent to conform with Generic Letter 89-04. Attachment 2 provides the revised Valve Testing program, Engineering Manual Procedure EM-09-02, Rev 14. This revision is submitted for NRC approval in accordance with the requirements of 10CFR50.55a(g)(4)(iv). Attachment 1 provides a summary of the changes made to our previous submittal of EM-09-02. These changes have been incorporated into our existing program. This submittal supersedes our previous valve testing program submittal dated February 28, 1990.

Gerald B Slade
General Manager

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

Attachment

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ATTACHMENT 1

Consumers Power Company
Palisades Plant
Docket 50-255

SUMMARY OF CHANGES TO PLANT PROCEDURE EM-09-02

"INSERVICE TESTING OF PLANT VALVES"

March 13, 1991

3 Pages

ATTACHMENT 1

SUMMARY OF CHANGES TO EM-09-02

The following changes have been made to the valve tables included in EM-09-02. These changes are intended to enhance the IST Program and are consistent with industry practices:

1. All tests required by ASME Section XI, IWV-3000, "Test Requirements" have been delineated in the valve tables to insure each valves' test requirements are indicated at the required test frequency.
2. The valve table format has been changed to provide valves by P&ID and system. The valves are listed alphanumerical for each P&ID. This change is consistent with industry trends which allows for ease of systematic reviews.
3. The valve "FUNCTION" has been provided for each valve in the program. This is denoted as a brief description of the design safety function of the valve.
4. The valve nominal size in inches and P&ID coordinates have been added to the program tables to provide additional information.
5. Valves for which seat leakage is not a requirement for fulfillment of their function (i.e. valves which prevent backflow in the closed direction) were categorized either B or C as apposed to AB or AC. Category A valves are typically Containment Isolation valves or valves with Technical Specification leakage limits.
6. Position Indication (PIT) and Fail Safe (FST) testing requirements have been added to all applicable Category A and B valves.
7. All Relief Valve (RT) testing has a five year test frequency per ASME Section XI, IWV. This is now indicated in the valve tables.
8. The 23 relief requirements and 28 cold shutdown justifications were revised to include the ASME paragraphs for which relief is being requested. In addition the basis statements were revised where applicable to include additional testing methodologies.

A total of eight new relief request and six new cold shutdown justifications were written to conform with ASME Section XI and Generic Letter 89-04 requirements.

The following is a detailed summary of the changes made to Procedure No. EM-09-02, Palisades Nuclear Plant Engineering Manual Procedure:

SECTION 1.0 - PURPOSE

1. Expanded to include two separate statements of purpose and streamlined by deleting the valve function statement.

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SUMMARY OF CHANGES TO EM-09-02

SECTION 2.0 - SCOPE

1. Added ASME Section XI compliance
2. Added statement defining effective 120 month interval
3. Added reference to IWV-1100 and IWV-1200
4. Added valve class statement from purpose section
5. Changed definitions sections to step 4 with responsibilities

SECTION 3.0 - REFERENCED

1. Added Tech Spec 4.0.2
2. Changed Reference 10CFR10, App. J to 10CFR50, App. J
3. Added References 3.15 through 3.71 to include all procedure numbers and titles that perform the valve tests mentioned.

SECTION 4.0 - DEFINITIONS AND RESPONSIBILITIES

1. Added definitions for Reverence Valve, Safety Classification, Valve Exercise Test, Full Stroke, Partial Stroke, Leakage Test, Backflow Test, Stroke Time, and Relief Requests. Deleted Definitions for Active Valves, Passive Valves, Category A, B, C, and D.

SECTION 5.0 - PROCEDURE

1. Added statement to 5.1.1 concerning valve categories and classifications. Also added to statement 5.1.2 a reference to 10CFR55a(g)(iii)(iv).
2. Added reference to valve exercising frequency at least once every three months to statement 5.2.1.a.
3. Deleted statement 5.2.1.d.3
4. Added statements 5.2.1.e and f concerning stroke time values and reference to 5.2.3.a and b.
5. Added test frequency reference to 5.2.3.a and b.
6. Added reference to Att. 3 in Section 5.2.3.j.2.
7. Added statement 5.2.4.a.3 referencing leakage test frequencies and criteria source.
8. Added Section 5.2.8 concerning Remote Position Indications for valves.

ATTACHMENT 1

SUMMARY OF CHANGES TO EM-09-02

9. Changed current Section 5.2.8 valve testing summary to Section 5.2.9.
 10. Added basis for reference stroke time to 5.3.1.a.
 11. Added Section 5.3.1.b establishing alert limits for valves.
 12. Revised current Section 5.3.1.b to 5.3.1.c and changed method of determining limiting stroke times to percentage multipliers instead of an ambiguous factor. These are in line with current established plant guidelines.
 13. Added Section 5.3.2.c regarding testing time intervals and allowable deviations.
 14. Deleted current step 5.4.4.a regarding added inspections upon failure of Category C exercising.
10. Various comments were incorporated either partially or in their entirety from the Technical Report prepared by Combustion Engineering.
 11. Valve tables of Attachment 1 and 2 have been removed and are now controlled in accordance with Palisades Administrative Procedure 10.41 as Engineering Guidelines by the Projects Department.