



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

June 13, 1991

Docket No. 50-255

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

Dear Mr. Slade

SUBJECT: CONSUMERS POWER COMPANY RESPONSE TO GENERIC LETTER 88-14,
INSTRUMENT AIR SUPPLY PROBLEMS AFFECTING SAFETY-RELATED
EQUIPMENT (TAC NO. 71693)

Generic Letter (GL) 88-14, dated August 8, 1988, requested that Consumers Power Co. (CPCo) review NUREG-1275, Volume 2, "Operating Experience Feedback Report - Air System Problems," and perform a design and operational verification of the instrument air system at the Palisades Plant. In addition to providing a discussion of your program for maintaining proper instrument air quality, GL 88-14 requested that you specifically:

1. Verify by test that actual instrument air quality is consistent with the manufacturer's recommendations for individual components served by the instrument air system;
2. Verify that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air; and
3. Verify that the design of the instrument air system, including air or other pneumatic accumulators, is in accordance with its intended function; and to verify, by test, that air-operated safety-related components will perform as expected for all design-basis events, including a loss of the normal instrument air system.

Item 1 above requests that manufacturer's recommendations be used when verifying air quality. Instead, for the stated reason of not having manufacturer's recommended air quality for all air system components, you used ANSI standard ANSI/ISA - S7.3-1975. This is considered acceptable.

You complied with the requests of Items 2 and 3, as stated above, with the discrepancies and associated resolutions listed below.

Your original response to GL 88-14, dated February 20, 1989, noted three deviations from ANSI standard ANSI/ISA - S7.3-1975 and committed to four actions to be taken to resolve these deviations. You determined that none of these deviations pose a significant maintenance or operational problem. In regards to

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Item 2, you stated that by conducting a thorough review of the air system maintenance practices, emergency procedures, and training, you determined the controls on plant air systems are adequate to ensure that safety-related equipment would function as intended on a loss of instrument air. You also reviewed the points in Item 3, above and found no design deficiencies. For the verification by test portion of this item, you stated that no additional testing need be performed since safety-related air components are tested to verify they perform their safety functions on loss of instrument air. This testing is controlled under Technical Specification Surveillances, Special Tests, Predetermined and Periodic Activity Controls, and specific plant procedures. This is acceptable.

Subsequent correspondence, dated June 26, 1990, detailed the implementation of the commitments made in your original response to the Generic Letter. This response has been reviewed and is considered acceptable.

Your files addressing the resolution of GL 88-14 issues should be maintained for future audit by the NRC staff. This completes our action under TAC No. 71693.

Sincerely,

/S/

Brian Holian, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

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Palisades Plant

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