



Consumers  
Power

**POWERING  
MICHIGAN'S PROGRESS**

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

G B Slade  
General Manager

November 11, 1991

Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
COMPLIANCE WITH PRESSURIZED THERMAL SHOCK RULE 10CFR50.61 AND REGULATORY  
GUIDE 1.99, REVISION 2 (TAC NO. <sup>M</sup>59970)

NRC letter dated September 3, 1991 requested additional information regarding the benchmarking and validation of Palisades in-house DOT 4.3 discrete ordinate transport code methodology reported in our April 17, 1991 submittal. Previously, Consumers Power Company had made two submittals, dated April 3, 1989 and May 17, 1990, which informed the NRC of the estimated fluence and the date when the Palisades reactor vessel beltline material would exceed the screening criteria of 10CFR50.61. The April 3, 1989 estimate was based on fluence determined by Westinghouse Corporation DOT methodology. The May 17, 1990 submittal was an update of the April 3, 1989 submittal and was based on the Palisades in-house DOT 4.3 methodology and the flux reduction program to be applied to the Palisades fuel design.

After a telephone conference with NRC reviewers, to clarify the September 3, 1991 request for additional information, we have determined that our in-house DOT 4.3 methodology requires more refining to adequately address the uncertainty in the measured flux values used in our May 17, 1990 submittal.

In view of the additional refinement required for our in-house DOT 4.3 methodology, we have further determined that our submittals dated May 17, 1990 and April 17, 1991, both of which are based on in-house DOT 4.3 methodology, are not adequately benchmarked and we hereby request their withdrawal. The Palisades reactor vessel 10CFR50.61 compliance status is, therefore, presently based on our April 3, 1989 submittal which uses Westinghouse DOT methodology.

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Response to the still applicable items in the September 3, 1991 request for additional information will be addressed in a properly benchmarked assessment of our compliance with 10CFR50.61, as amended on May 15, 1991 and made effective June 14, 1991, which we will submit by December 16, 1991.



Gerald B Slade  
General Manager

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