



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

G B Slade
General Manager

December 20, 1991

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - RESPONSE TO GENERIC LETTER 88-20, SUPPLEMENT 4, INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS FOR SEVERE ACCIDENT VULNERABILITIES

Generic Letter 88-20, Supplement 4, requests licensees to describe their proposed programs for completing the Individual Plant Examination of External Events for Severe Accident Vulnerabilities (IPEEEs) by December 26, 1991. Also, this generic letter supplement encourages coordination of the seismic portion of the IPEEE with Unresolved Safety Issue (USI) A-46, "...so that the objectives of both activities may be accomplished with a single walkdown effort." As stated in NRC SECY-91-102, the procedures for the seismic walkdown portion of this program are "...one of the most important ingredients in the seismic IPEEE, [and] are similar to those that will be used in the implementation of Unresolved Safety Issue (USI) A-46...."

Consumers Power Company agrees with NRC staff that the walkdowns of each program should be combined into a single walkdown.

Palisades Plant is a USI A-46 plant and a member of the Seismic Qualification Utility Group (SQUG). Because of the similarities of the two programs, we intend to conduct seismic IPEEE and A-46 walkdowns at the same time to avoid repetition of essentially the same work within a short time span. However, the anticipated final Supplemental Safety Evaluation Report (SSER) on the SQUG's Generic Implementation Procedure (GIP) for resolution of USI A-46 has not been made available in sufficient time to permit finalization of a coordinated plan and schedule for the seismic portion of the IPEEE in this response.

9901030958 9/12/90
PDR ADPCR 05000283
P PDR

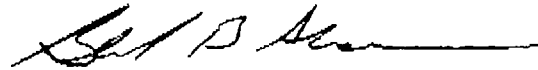
CPCo's tentative plans for the seismic IPEEE program are described later in this letter. However, because of the delay in issuance of the GIP SSER, Consumers Power Company is not able to submit a firm schedule to complete the seismic portion of the IPEEE until after receipt and review of the SSER. We will submit our final schedule within 120 days following receipt of the SSER. Following review of the SSER Consumers Power Company may modify its program for conducting the seismic IPEEE depending on the content of the SSER and resolution of open issues.

For the Palisades Plant, Consumers Power Company will develop a seismic PRA and utilize the FIVE methodology for fires to fulfill the requirements of Generic Letter 88-20, Supplement 4. The seismic risk assessment will be coordinated with the actions taken to resolve USI A-46, "Verification of Seismic Adequacy of Equipment in Operating Plants," using the SQUG Generic Implementation Procedure (GIP) when approved for use. The risk assessment will be completed in a manner consistent with the guidance of NUREG/CR-2300, "PRA Procedures Guide," the guidance provided in the generic letter (including enhancements identified in Appendix 1) and NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." The fire analysis will be completed using the FIVE methodology to analyze fire propagation instead of the COMPBRN code. The other external events will be evaluated consistent with the screening approach discussed in the generic letter.

The plant model developed in the Individual Plant Examination (IPE) process will be used as the basis for conducting the seismic risk assessment and fire analysis. To the extent possible internal resources will be utilized in conducting the assessment or as participants to acquire the necessary information and experience to maintain the analysis for possible future use. Regarding other external events programs, resolution of the Eastern United States Seismicity (The Charleston Earthquake) issue is assumed to be accomplished via completion of the IPEEE. The reliability of the decay heat removal system given an external event will also be addressed as part of the IPEEE. USI A-17, "Systems Interactions in Nuclear Power Plants," and USI A-40, "Seismic Design Criteria, A Short-Term Program," are considered resolved by completion of the A-46 process.

The IPEEE process for the Palisades Plant will be completed within a time frame consistent with the originally identified three years. Adjustments to the schedule for actions necessary to coordinate the walkdown and other applicable portions of the process with the USI A-46 methodology will be submitted no later than 120 days following issuance of the GIP SSER. Principally, the availability of planned outages to complete the walkdown

portion will be the critical path to completing the project. It is not considered prudent or justifiable to shut down the plant to complete the required walkdown activities. Therefore, the availability of an approved Generic Implementation Procedure may have a significant impact on the schedule. Ongoing evaluations of shutdown risk and coordination of the use of risk assessment to support internal prioritization of plant issues may also necessitate other adjustments to the proposed schedule.



Gerald B Slade
General Manager

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