



**Consumers  
Power**

**POWERING  
MICHIGAN'S PROGRESS**

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

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**G B Slade**  
*General Manager*

Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - GENERIC MULTI-PLANT ISSUE B-11, "SUSCEPTIBILITY OF SAFETY-RELATED SYSTEMS TO FLOODING CAUSED BY THE FAILURE OF NON-CATEGORY I SYSTEMS"

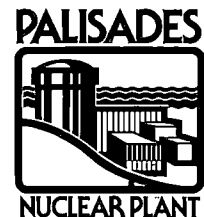
During the development of the design basis document (DBD) for the diesel generators, as part of our Configuration Control Project, it was discovered that Consumers Power Company had not responded to an NRC letter dated July 16, 1981 concerning generic multi-plant issue B-11, "Susceptibility of Safety-Related Systems to Flooding Caused by the Failure of Non-Category I Systems." Specifically, the issue B-11 concern at Palisades was related to the potential flooding of the of the rooms containing the auxiliary feedwater pumps and the diesel generators. The purpose of this letter is to provide resolution to this issue.

In a letter dated April 30, 1981, the NRC expressed a concern that the auxiliary feedwater pump room containing auxiliary feedwater pumps P-8A and P-8B was subject to flooding from internal sources. The letter further stated that the licensee was evaluating a permanent solution to the NRC concern.

Since the issuance of the NRC letter dated April 30, 1981, Consumers Power Company has added a third auxiliary feedwater pump at the Palisades Plant. This third pump is located in the West Engineered Safeguards Room. The measures provided to prevent flooding of the West Engineered Safeguards Room are discussed in Section 2.4.6 of the technical evaluation which was attached to the NRC's April 30, 1981 letter. The third auxiliary feedwater pump is located in a room remote from the other two auxiliary feedwater pumps and thus the operability of all three auxiliary feedwater pumps would not be simultaneously impaired due to internal flooding. Therefore, CPCo considers this concern resolved and no further action is required.

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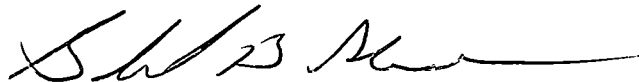


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A second concern expressed in the technical evaluation attached to the NRC's April 30, 1981 letter dealt with flooding in the diesel generator rooms. The flooding concern arose from a postulated break in the fire system line in the diesel generator rooms. The technical evaluation did not account for drains located in each of the diesel generator rooms, which empty into a sump supervised by a Control Room alarm. An evaluation in 1986, which accounted for these drains, concluded that the drains were sufficient to prevent simultaneous impairment of both diesel generators; however, the evaluation was qualitative in that it was not supported by engineering analysis. This evaluation has been incorporated in Section 5.4.2 of the Palisades Final Safety Analysis Report (FSAR). Based on this evaluation we have concluded that no safety issue exists.

In the absence of a supporting engineering analysis for the effect of flooding in the diesel generator rooms, further documentation is considered prudent. In conjunction with Phase III of our Configuration Control Project, we are planning the development of an internal report on the issue of flooding from internal sources. Included in the report will be documentation for the resolution of diesel generator room flooding. The report is scheduled for completion by the end of 1994.

The effect of flooding on plant safety, which includes flooding of the diesel generator rooms, is a topic that is also being addressed in the Integrated Plant Evaluation (IPE) for Palisades. The IPE is scheduled for submittal to the NRC in the near future.



Gerald B Slade  
General Manager

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