



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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

April 19, 1993

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - WITHDRAWAL OF COMMITMENTS

As part of Consumers Power Company's overall response to the Nuclear Regulatory Commission's Confirmatory Action Letter CAL-RIII-86-002, dated May 21, 1986, commitments were made to annually overhaul the hotwell sampling and radwaste caustic injection pumps due to their history of repeated malfunctioning. Additionally a commitment was made to proceduralize the steps for installation of pump parts and the methods for preventing piping and fitting leaks. Another commitment was made to disassemble and inspect the condensate pumps' recirculation control valve every refueling outage. The commitments are being withdrawn based on the following:

1. Perform annual overhaul of hotwell sampling and caustic injection pumps.

Hotwell sampling pumps P-64A&B were originally designed as the primary means of sampling the condenser hotwell. The hotwell is presently being sampled at the discharge of the condensate pumps, which has proven to be a more accurate method of sampling. Because of this, P-64A&B are now considered redundant equipment, whose failure would have no effect on plant operation or safe shutdown. Their only use, at this point, would be to perform sampling in the event of a suspected condenser tube leak, which is less likely to occur since the condenser was completely rebuilt during our 1990 Refueling Outage. The recent maintenance history on the pumps shows no need for annual rebuilding or inspection.

Radwaste caustic injection pumps P-100A&B provide caustic injection to the "B" Evaporator. Due to the reduction in radwaste being generated in the plant, the pumps operate infrequently. Recent maintenance history shows the pumps do not require annual rebuilding or inspection. Both are positive displacement pumps and perform a redundant function. They are located in a high visibility area and are monitored on a daily basis by Auxiliary Operators. The failure of these pumps would have no effect on plant operation or safe shutdown.

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A review of the use of the pumps and other equipment involved, coupled with an ongoing evaluation of ways to improve the allocation of maintenance resources has led us to conclude that the annual overhaul of the pumps is not necessary. Repair or replacement of the pumps will occur on an as-needed basis in accordance with the plant Maintenance Work Request/Work Order Program.

2. Proceduralize the steps involved with the installation and fit-up of the hotwell sampling and caustic injection pumps.

The "procedures" consisted of the Periodic and Predetermined Activity Control Sheets (PPACS) written to perform the annual pump overhaul. The PPACS directed the repairworker to the pump vendor manuals for needed instructions on installation and proper fit-up. Although the PPACS have been deleted, the vendor manuals are still available on site and become part of any work request/work order package written for maintenance or replacement of the pumps.

3. Disassemble and inspect condensate pump recirculation valve CV-0730 each refueling outage.

Control valve CV-0730 controls the recirculation flow from the condensate pumps to the main condenser. In order to prevent condensate pump recirculation flow, CV-0730 would have to fail closed in such a manner that it could not be opened by operator action. Because the valve required manual action to open during the May 19, 1986, plant trip, a commitment was made to disassemble and inspect CV-0730 every refueling outage.

Disassembly and inspection of CV-0730 every refueling outage is not necessary, since we currently perform other, less intrusive, periodic verifications of the valve's operability. Repair or replacement of the valve will be performed on an as-needed basis in accordance with the plant Maintenance Work Request/Work Order Program.



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