

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 6, 1994

Docket No. 50-255

Mr. Robert A. Fenech Vice President, Nuclear Operations Consumers Power Company Palisades Plant 27780 Blue Star Memorial Highway Covert, Michigan 49043

Dear Mr. Fenech:

SUBJECT: PALISADES PLANT - SAFETY EVALUATION OF OVERLAY REPAIRS OF

CONTAINMENT SUMP CHECK VALVES (TAC NO. M88874)

By letter dated March 6, 1994, Consumers Power Company (CPCo) reported a leak in a 24-inch austenitic stainless steel containment sump check valve (CK-ES3166) and requested approval for the use of Code Case N-504-1 weld overlay repair for the leaking valve and the corresponding valve (CK-ES3181) in the alternate train. In the submittal, CPCo included a root cause analysis for the leaking valve, a flaw stability calculation, the repair plan, design calculations, and drawings for the repair. CPCo requested staff approval for using an alternative to the ASME Boiler and Pressure Vessel Code, Section XI requirements under 10 CFR 50.55a(a)(3)(i). Specifically, CPCo proposed using Code Case N-504-1, unapproved by the staff, as an alternative providing an acceptable level of quality and safety. Under this Code case, CPCo is repairing defects in check valves by weld overlays. The staff has reviewed the request and concludes that CPCo's alternative repair will provide an acceptable level of quality and safety and, therefore, authorizes its use pursuant to 10 CFR 50.55a(a)(3)(i).

The basis for our findings and conditions are provided in the enclosed safety evaluation.

In view of the fact that the NRC requires certain information from licensees who perform similar overlay repairs under Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," CPCo should document the as-deposited ferrite content, the as-built overlay thickness, and an analysis of the shrinkage stresses done according to the criteria of Code Case N-504-1. CPCo should also send its written commitment to inspect these valves every refueling outage using ultrasonic techniques demonstrated to be effective. This requested information and the commitment should be submitted within 30 days of completing the current forced outage.

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The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by John B. Hickman for:

Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Enclosure:

Safety Evaluation

cc w/enclosure: See next page

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cc: Plant Service List

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Mr. Robert A. Fenech Consumers Power Company

cc:

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