

David W. Rogers Plant Safety and Licensing Director

MICHIGAN'S PROGRESS

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

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Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - DC SYSTEM VENTILATION REQUIREMENTS

In late 1981 or early 1982 as part of Systematic Evaluation Program Topic IX-5, the NRC questioned the potential heatup in the cable spreading and the 1-C and 1-D switchgear rooms which may result from a loss of heating, ventilating, and air conditioning (HVAC) during a loss of offsite power. In response, Consumers Power Company (CPC) committed to determine the effect of a loss of HVAC in those areas by testing.

CPC's November 1, 1982 letter reported our evaluation of the results of those tests. In that letter we stated that it was observed that the inverter cabinets, the charger cabinets and the auxiliary feedwater control circuit junction boxes in the cable spreading room require forced air cooling during a loss of offsite power. Additionally, we stated that we would add fans in those cabinets and junction boxes as appropriate to ensure adequate ventilation during periods when normal ventilation is out of service due to a loss of offsite power. In Supplement No. 1 to Nureg-0820, the NRC acknowledged our commitment to add fans for this equipment to ensure adequate ventilation for an event causing a loss of room ventilation and found it to be acceptable.

In 1983, a Facility Change (FC) was initiated to install those fans. As part of an extensive evaluation performed for that FC, it was determined that the inverter cabinets, the charger cabinets and the auxiliary feedwater control circuit junction boxes do not require forced air cooling during a loss of offsite power. However, cooling fans were installed in the inverter and charger cabinets as an enhancement not required for safety. Consequently, non-safety grade fans were installed in the inverter and charger cabinets. Fans were not installed in the auxiliary feedwater control circuit junction boxes. No documentation has been found supporting the statement in our 1982 letter that it was observed that the inverter cabinets, the charger cabinets and the auxiliary feedwater junction boxes in the cable spreading room require forced-air cooling. Therefore, since both that November 1, 1982 letter and Section 8.7.3.1 of the updated FSAR imply that safety grade fans are required in those locations, we are taking the following actions to remove that implication and to decrease the probability of misinterpretation:

- 1. We are initiating revision of Section 8.7.3.1 of the updated FSAR; and
- 2. By this letter, we are removing any implication made by the statement in our 1982 letter that forced air cooling is required in the inverter cabinets, the charger cabinets and the auxiliary feedwater control circuit junction boxes in the cable spreading room. As determined by the evaluation for 1983 Facility Change to install fans that would supply that forced air circulation, no forced air circulation is required to cool the inverter cabinets, charger cabinets and auxiliary feedwater control circuit junction boxes in the cable spreading room.

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CC Administrator, Region III, USNRC NRC Resident Inspector - Palisades 2