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

April 29, 1994

David W. Rogers

Plant Safety and Licensing Director

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - REPLY TO NOTICE OF VIOLATION; NRC INSPECTION REPORT NO. 92028 - EXTENSION OF COMPLETION DATE

NRC Inspection Report No. 92028, dated January 21, 1993, forwarded the results of the NRC inspection conducted from December 7 through 18, 1992 in the area of inservice testing. The inspection report identified an apparent violation of NRC requirements pertaining to inadequate acceptance criteria for certifying that the Primary Coolant System (PCS) loop check valves and Low Pressure Safety Injection (LPSI) check valves were exercised to their full open position. Our Reply to the Notice of Violation was dated February 22, 1993.

In corrective action 4 to our Reply to the Notice of Violation, the action to avoid future non-compliance, was a commitment that the check valve portion of the ISI program would be reviewed to verify that: (a) all check valves requiring full flow testing are included in the valve testing program; (b) the correct required flow rates and basis for the flow rates are properly listed for each check valve in the valve testing program; and (c) all test procedures that take credit for full flow testing state the correct flow rates as acceptance criteria.

The above actions were originally proposed to be completed by July 15, 1993. Our July 6, 1993 letter to the NRC extended our forecast completion date to December 1, 1993 due to other higher priority work activities. Our November 30, 1993 letter to the NRC identified that action (a) had been completed, but extended our forecast completion date for actions (b) and (c) to May 1, 1994, due to the extension of the 1993 refueling outage and the commitment of resources to the Service Water Operation Performance Inspection. As discussed below, we are again extending the forecast completion date of actions (b) and (c).

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While preparing for the Service Water Operational Performance Inspection, issues surrounding the connection between inservice testing and the design basis accident analyses were identified. Resolution of these issues is resulting in changes to flow rates used for various systems in the accident analyses. This reanalysis effort will change the required flow rates through many of the valves in the ISI program. Because of these additional reviews we will complete actions (b) and (c) by December 15, 1994.



David W Rogers
Plant Safety and Licensing Director

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