



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

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Nuclear Regulatory Commission
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - NOTIFICATION OF CHANGE IN IMPLEMENTATION SCHEDULE FOR A SECURITY AND A SWSOPI COMMITMENT

During the first half of 1994, the Palisades Plant completed a 118 day forced outage and an NRC Diagnostic Evaluation Team Inspection. During the same period, Consumers Power Company decided to systematically evaluate areas warranting improvement, prioritize actions to achieve improvement, and to integrate these actions into a Palisades Performance Enhancement Plan. As part of this improvement effort, we recently completed a review of all commitments to the NRC that are coming due in 1994. The results of our review confirm that we can meet all of the commitments with two exceptions. A description of the exceptions along with their status is listed below. A similar review of other commitments to the NRC is being performed as part of the Palisades Performance Enhancement Plan actions to improve our overall management of commitments.

SECURITY

During a security inspection conducted from May 10 to May 18, 1993 as documented in inspection report 93-011, an inspector follow-up item (93011-02) concerning intrusion detection equipment was discussed.

During a subsequent inspection conducted from March 1 to April 21, 1994 (IR 94005), Consumers Power Company reported to the security inspector that modifications to address this inspector follow-up item were forecast to be completed in August 1994. This information was restated in NRC Inspection Report 94-005.

This letter is to inform you that the intrusion detection modifications will not be completed in August 1994.

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Due to the number and scope of ongoing plant projects which are of a higher priority, resources required to complete the intrusion detection equipment modifications are not available in 1994.

It is our intent to complete these modifications by December 31, 1995. The NRC will be notified once we have determined a schedule for completion of the modifications.

This delay in implementing the subject modifications does not affect the implementation of the plant's security plan.

SWSOPI

During the period January 10 through February 11, 1994, a Region III inspection team conducted a service water system operational performance inspection (SWSOPI) at the Palisades Nuclear Generating Facility. As a result of that inspection, an apparent violation was identified where inadequate or no corrective actions were taken to address previously identified concerns.

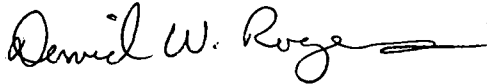
One of the examples supporting the apparent violation was the discovery of instrument tubing in front of the component cooling water (CCW) heat exchangers that was bent and had the appearance of being repeatedly stepped on. Also, the unistrut supports for the instrument lines were bent bringing into question the seismic adequacy of the tubing. In addition, the tubing configuration represented original plant construction practice and the spacing of the instrument tubing and supports was not in accordance with current installation standards. A number of corrective actions have been or are being taken to address instrument tubing at Palisades. These corrective actions were the subject of an enforcement conference on March 11, 1994 and our response to the notice of violation on June 6, 1994.

This letter is to inform you of one corrective action that will not be completed on the schedule committed to at the enforcement conference. The commitment involved the analysis of a sample of instrument tubing at Palisades to assess the safety significance of instrument tubing support spacing not being in accordance with current installation standards. During the enforcement conference we stated that completion of this analysis was scheduled for September 1, 1994. However due to other higher priority engineering tasks, this analysis is now scheduled for completion by December 31, 1994. This delay is judged to be acceptable from a plant safety perspective due to the completion of an extensive inspection of safety related instrument tubing during the recent forced outage. This inspection of safety related instrument tubing both inside and outside containment corrected a number of instrument tubing material condition issues like those identified in the SWSOPI. In addition, tubing support spacing was found to be generally adequate to assure tubing operability. Therefore, it was concluded that the safety related tubing in the plant is operable. The planned analysis of instrument tubing support spacing will serve to verify this operability conclusion and provide a more rigorous basis on which to address future instrument tubing concerns.

SUMMARY OF COMMITMENTS

In summary, this letter contains no new commitments. Due dates for two existing commitments were changed as follows:

- a. We will complete the intrusion detection equipment modifications necessary to follow-up item 93011-02 by December 31, 1995.
- b. Analysis of the safety significance of instrument tubing not meeting current installation standards will be completed by December 31, 1994.



David W Rogers
Safety and Licensing Director

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