



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 9, 1995

Mr. Kurt M. Haas
Plant Safety and Licensing Director
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - JUSTIFICATION FOR CONTINUED OPERATION - POTENTIAL
RADIOACTIVE RELEASE PATH (TAC NO. M80402)

Dear Mr. Haas:

By submittal dated January 10, 1992, as supplemented by submittals dated April 21 and July 28, 1992, Consumers Power Company (CPCo) requested our permission for continued operation of the Palisades Plant until the beginning of Fuel Cycle 12 and provided a justification for continued operation (JCO). In the JCO submittals, it was pointed out that the discovery of the existence of a potential leak path for radioactive containment sump water to the safety injection and refueling water (SIRW) tank during the recirculation phase of a postulated loss-of-coolant accident (LOCA) raised an unreviewed safety issue. This is because the tank is vented directly to the atmosphere unmonitored via a 6-inch line, and CPCo had not previously considered the tank vent release as a source term when calculating its control room operator and offsite doses. In the January 10 and April 21, 1992, submittals, CPCo committed to provide by April 30, 1992, a new design basis LOCA analysis (maximum hypothetical accident (MHA)) to account for the additional dose contributions to control room and offsite doses due to SIRW tank vent release and identify the modifications needed to support the analysis. CPCo further added that it would complete all the modifications by the beginning of Fuel Cycle 12.

In the April 21, 1992, submittal, CPCo provided the proposed compensatory measures including limited administrative controls and the interim calculated doses with the associated assumptions. The submittal additionally included responses to our questions based on the review of the January 10, 1992, submittal. In the submittal dated July 28, 1992, CPCo revised the source term assumptions to be consistent with Regulatory Guide 1.4 guidelines and recalculated the interim control room doses and offsite doses for the design basis LOCA.

We have completed our review of the above submittals and enclosed is our safety evaluation. We find the responses to our questions relating to continued plant operation, the compensatory measures, and the assumptions used in the interim dose analyses to be acceptable. Further, we find the calculated interim control room operator doses and offsite doses are within

9501120089 950109
PDR ADDOCK 05000255
P PDR

NRC FILE CENTER COPY

AA3
DF01

K. Haas

- 2 -

January 9, 1994

the applicable General Design Criterion 19 and 10 CFR Part 100 limits. Based on the above, we conclude that the JCO for Palisades is acceptable for continued operation until completion of the final MHA analysis during Fuel Cycle 12, but no later than January 1996.

Sincerely,

ORIGINAL SIGNED BY

Marsha Gamberoni, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: Safety Evaluation

cc w/encl: See next page

DISTRIBUTION:

Docket File
PUBLIC
PD31 Reading File
JRoe
JHannon
MGamberoni
CJamerson
OGC
ACRS (4)
WKropp, RIII
JHayes

cc: Plant Service list

FILENAME: G:\WPDOCS\PALISADE\PAL80402.LTR

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure
"N" = No copy

OFFICE	LA:PD31	PM:PD31	BC:TERB	PD:PDIII-1
NAME	CJamerson	MGamberoni	CMiller	JHannon
DATE	12/29/94	12/29/94	1/4/95	12/9/94

OFFICIAL RECORD COPY

Mr. Robert A. Fenech
Consumers Power Company

Palisades Plant

cc:

Mr. Thomas J. Palmisano
Plant General Manager
Palisades Plant
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
Department of Public Health
3423 N. Logan Street
P. O. Box 30195
Lansing, Michigan 48909

Mr. Kurt M. Haas
Plant Safety and Licensing Director
Palisades Plant
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington DC 20037

M. I. Miller, Esquire
Sidley & Austin
54th Floor
One First National Plaza
Chicago, Illinois 60603

Alora Davis
Commitment Tracking System
Coordinator
Palisades Plant
Consumers Power Company
27780 Blue Star Memorial Highway
Covert, Michigan 49043-9530

Mr. Thomas A. McNish, Secretary
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Michigan Department of Attorney
General
Special Litigation Division
630 Law Building
P.O. Box 30212
Lansing, Michigan 48909

Judd L. Bacon, Esquire
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Jerry Sarno
Township Supervisor
Covert Township
36197 M-140 Highway
Covert, Michigan 49043

Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

U.S. Nuclear Regulatory Commission
Resident Inspector Office
Palisades Plant
27782 Blue Star Memorial Highway
Covert, Michigan 49043