

September 25, 1995

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

SUBJECT: PALISADES PLANT - REQUEST FOR ADDITIONAL INFORMATION ON GENERIC LETTER (GL) 95-03 (TAC NO. M92260)

Dear Mr. Haas:

On April 28, 1995, the U.S. Nuclear Regulatory Commission issued GL 95-03, "Circumferential Cracking of Steam Generator Tubes," which requested addressees to evaluate recent operating experience related to circumferential cracking, justify continued operation until the next scheduled steam generator tube inspections, and develop plans for the next steam generator tube inspections. The staff has reviewed the June 27, 1995, response provided by Consumers Power Company for the Palisades plant. As a result of the review of your response, the staff has identified areas for which additional information and/or clarification is needed. The enclosure to this letter contains the information needed for the staff to complete its review of your response to GL 95-03. A response is requested within 30 days from the date of this letter. In addition, we request that you resubmit the notarized statement. The signed statement provided in your June 27, 1995, response was incorrectly dated (1994).

This request is within the original reporting burden for information collection of 350 hours covered by OMB clearance number 3150-0011, which expires on July 31, 1997. If you have any questions regarding this request, please contact me at (301) 415-3024.

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: Request for Additional Information

cc w/encl: See next page

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## REQUEST FOR ADDITIONAL INFORMATION

1. It was indicated that circumferential cracking has not been identified at tube support plate intersections or in low row U-bends for inservice Combustion Engineering (CE) steam generators and that these areas are not considered areas of susceptibility applicable to Palisades. Provide the basis for this statement given that these areas have exhibited cracking in a CE steam generator that was replaced and given that these areas have exhibited circumferential cracking in steam generators manufactured by another vendor (i.e., at dented regions and in low radius U-bend tubes).
2. Please clarify the statement that "any eddy current indication identified as a crack will be structurally evaluated for proper repair."
3. During the Maine Yankee outage in July/August 1994, several weaknesses were identified in its eddy current program as detailed in NRC Information Notice 94-88, "Inservice Inspection Deficiencies Result in Severely Degraded Steam Generator Tubes." In Information Notice 94-88, the staff observed that several circumferential indications could be traced back to earlier inspections when the data was reanalyzed using terrain plots. These terrain plots had not been generated as part of the original field analysis for these tubes. For the rotating pancake coil (RPC) examinations performed at your plant at locations susceptible to circumferential cracking during the previous inspection (i.e., previous inspection per your Generic Letter 95-03 response), discuss the extent to which terrain plots were used to analyze the eddy current data. If terrain plots were not routinely used at locations susceptible to circumferential cracking, discuss whether or not the RPC eddy current data has been reanalyzed using terrain mapping of the data. If terrain plots were not routinely used during the outage and your data has not been reanalyzed with terrain mapping of the data, discuss your basis for not reanalyzing your previous RPC data in light of the findings at Maine Yankee.

Discuss whether terrain plots will be used to analyze the RPC eddy current data at locations susceptible to circumferential cracking during your next steam generator tube inspection (i.e., the next inspection per your Generic Letter 95-03 response).

ENCLOSURE

Mr. Kurt M. Haas  
Consumers Power Company

Palisades Plant

cc:

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August 1995