



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

January 17, 1996

U S Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
REQUEST FOR APPROVAL OF ALTERNATE SNUBBER TEST PROGRAM

In accordance with 10CFR50.55a(a)3, NRC approval is requested for an alternate snubber test program, as outlined in Attachment A.

This request involves performing our snubber test program in conformance with Generic Letter 90-09 and current Technical Specification 4.16.1, instead of in conformance with the operating and maintenance standard of the first Addendum to ASME/ANSI OM-1987, Part 4 (OMa-1988), as specified in 10CFR50.55a.

Subparagraph 2.3.3b of OMa-1988, Part 4 states, "... the examination sample size for the next required examination of the group may be reduced if justified by the owner and accepted by the regulatory authority having jurisdiction at the facility." Based on this statement, with the NRC as the regulatory authority, Palisades requests NRC approval to use the guidance of Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." With the use of Generic Letter 90-09 guidelines, a cost savings and a reduction in unnecessary radiological exposure (for personnel having to comply with the visual examination requirements) will result.

Pursuant to 10CFR50.55a(a)(3) and the justification provided in Attachment A, we believe that the proposed alternative provides an acceptable level of quality and safety to meet NRC requirements.

9601230162 960117
PDR ADOCK 05000255
P PDR

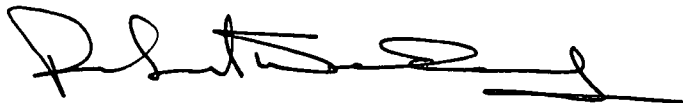
230088

A CMS ENERGY COMPANY

A001
11

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.

A handwritten signature in black ink, appearing to read 'R. Smedley', with a long horizontal flourish extending to the right.

Richard W Smedley
Manager, Licensing

CC Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

Attachment

ATTACHMENT A

**CONSUMERS POWER COMPANY
PALISADES PLANT
DOCKET 50-255**

REQUEST FOR APPROVAL OF ALTERNATE SNUBBER TEST PROGRAM

REQUEST FOR APPROVAL OF ALTERNATE SNUBBER TEST PROGRAM

Code Classes: Various

COMPONENTS: Safety- Related Snubbers

CLASS: 1, 2, and 3

FUNCTION:

Snubbers (shock suppressors) prevent the unrestrained movement of safety-related components (including piping) during an earthquake or severe transient to prevent failure of the restrained component or adjacent safety-related equipment.

TEST REQUIREMENT:

IWF-5300

- (a) Inservice examinations (of snubbers) shall be performed in accordance with the first Addendum to ASME/ANSI OM-1987, Part 4 (OMa-1988)
- (b) Inservice examination sample size shall be determined in accordance with subparagraph 2.3.3b of the first Addendum to ASME/ANSI OM-1987, Part 4 (OMa-1988).

ALTERNATIVE TESTING:

In lieu of the schedule requirements of OMa-1988, Palisades will follow the guidance of Generic Letter 90-09 for snubber visual examinations. The guidance of Generic Letter 90-09 has been approved for use at Palisades as documented in Docket 50-255, dated June 13, 1992 and Technical Specification Amendment Number 164, dated April 20, 1995.

- 1. The proposed alternative provides for 100% visual examination of the snubber population and for a decrease in the examination frequency (increase in the examination interval) in the event that no unacceptable snubbers are found.
- 2. If one or more unacceptable snubbers are found during visual examination, the next examination interval shall be 2/3 of the previous interval.

JUSTIFICATION FOR SNUBBER RELIEF REQUEST NUMBER ONE

BASIS FOR RELIEF:

Pursuant to 10CFR50.55a(a)(3)(i), the proposed alternative provides an acceptable level of quality and safety. Subparagraph 2.3.3b of OMa-1988, Part 4 states, "... the examination sample size for the next required examination of the group may be reduced if justified by the owner and accepted by the regulatory authority having jurisdiction at the facility." Based on this statement, Palisades requests permission to use the guidance of Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

The proposed alternative program follows the guidance of Generic Letter 90-09 to establish snubber schedule requirements and has the following features:

1. The proposed alternative program is included in the Palisades Plant Facility Operating License DPR-20, Appendix A, Technical Specifications, as amended through Amendment 164.
2. This alternative provides the same confidence level as existing OMa-1988, Part 4 requirements and will generally allow visual examinations and corrective actions during plant outages. Occupational radiation exposure will be reduced by performing examinations during outages.

ACCEPTANCE CRITERIA:

The visual examination acceptance criteria shall comply with the criteria provided in ASME/ANSI OMa-1988, Part 4 and as approved by the NRC.