



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

April 17, 1996

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

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
RESPONSE TO GENERIC LETTER 96-01: TESTING OF SAFETY-RELATED LOGIC
CIRCUITS**

On January 10, 1996, the Nuclear Regulatory Commission (NRC) issued Generic Letter 96-01, "Testing of Safety-Related Logic Circuits." It requested that licensees perform a review of their reactor protection system, Emergency Diesel Generator (EDG) load shedding and sequencing, and actuation logic for the engineered safety features systems to ensure that all portions of the logic circuitry are adequately covered in surveillance procedures which fulfill Technical Specification (TS) requirements. The purpose of this letter is to provide the response required by Generic Letter 96-01.

NRC Requested Action:

1. *Compare electrical schematic drawings and logic diagrams for the reactor protective system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including parallel logic, interlocks, bypasses and inhibit circuits, are adequately covered in the surveillance procedures to fulfill the TS requirements. This review should also include relay contacts, control switches and other electrical components within these systems, utilized in the logic circuits performing a safety function.*

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Consumers Power Company Response:

1. Consumers Power Company will compare electrical schematic drawings and logic diagrams for the reactor protective system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including parallel logic, interlocks, bypasses and inhibit circuits, are adequately covered in the surveillance procedures to fulfill the TS requirements. This review will consider switchgear/relay contacts and other safety-related electrical components within the logic circuits of these systems. It will be completed by the end of the first refueling outage after January 10, 1997. This outage is currently projected to begin in April 1998.

NRC Requested Action:

2. *Modify the surveillance procedures as necessary for complete testing to comply with the Technical Specifications. Additionally, the licensee may request an amendment to the technical specifications if relief from certain testing requirements can be justified.*

It is requested the completion of these actions be accomplished prior to startup from the first refueling outage commencing one year after the issuance of the generic letter.

Consumers Power Company Response:

2. In the event the above review identifies components not tested in accordance with our Technical Specification requirements, actions will be taken in accordance with the provisions of the Palisades Technical Specifications and the guidance provided in NRC Generic Letter 91-18. Surveillance procedures will subsequently be modified to provide for complete testing of the system to comply with the technical specifications.

No amendment to the technical specifications for relief from testing requirements is planned at this time. On March 29, 1996, Consumers Power Company submitted a request to implement Improved Standard Technical Specifications (ISTS). Most standard requirements that were not included in our existing technical specifications were incorporated into the ISTS request. It is likely that the ISTS will be implemented before the planned April 1998 refueling outage. Consumers Power Company will complete the implementation of any additional required action before the end of that outage.

NRC Required Response:

3. *Within 60 days of the date of this generic letter, submit a written response indicating whether or not the addressee will implement the actions requested above. If the addressee intends to implement the requested actions, submit a schedule for completing implementation. If an addressee chooses not to take the requested actions, submit a description of any proposed alternative course of action, the schedule for completing the alternative course of action (if applicable), and the safety basis for determining the acceptability of the planned alternative course of action.*

Consumers Power Company Response:

3. As suggested by the February 14, 1996 NRC letter from B A Boger to A Marian of NEI, this letter provides the required response to GL 96-01 within 30 days from the date of the March 19, 1996, Nuclear Energy Institute (NEI) workshop in Atlanta, Georgia. Consumers Power Company will implement the actions requested above. Consistent with NRC guidance provided at the NEI workshop, Consumers Power Company will complete implementation of the requested actions at the first refueling outage after January 10, 1997. This outage is currently projected to begin in April 1998.

NRC Required Response:

4. *Within 30 days of completion of the above-requested actions, submit a response confirming completion.*

Consumers Power Company Response:

4. Consumers Power Company will submit a response confirming completion within 30 days of completing the required actions.

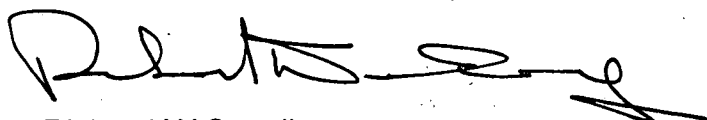
SUMMARY OF COMMITMENTS

This letter contains two new commitments and no revisions to existing commitments. The new commitments are:

1. Consumers Power Company will compare electrical schematic drawings and logic diagrams for the reactor protective system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems

against plant surveillance test procedures to ensure that all portions of the logic circuitry, including parallel logic, interlocks, bypasses and inhibit circuits, are adequately covered in the surveillance procedures to fulfill the TS requirements. This review will consider switchgear/relay contacts and other safety-related electrical components within the logic circuits of these systems. It will be completed by the end of the first refueling outage after January 10, 1997. This outage is currently projected to begin in April 1998.

2. Consumers Power Company will submit a response confirming completion within 30 days of completing the required actions.

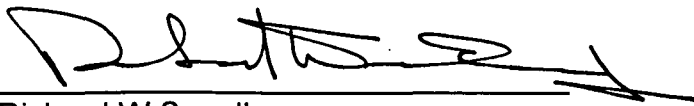


Richard W Smedley
Manager, Licensing

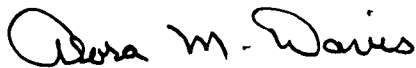
CC Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

CONSUMERS POWER COMPANY

To the best of my knowledge, the contents of this letter containing our response to Generic Letter 96-01, are truthful and complete.

By 
Richard W Smedley
Manager, Licensing

Sworn and subscribed to before me this 17th day of April 1996.


Alora M. Davis, Notary Public
Berrien County, Michigan
(Acting in Van Buren County, Michigan)
My commission expires August 26, 1999

[SEAL]

