



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 28, 1996

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE INSERVICE INSPECTION PROGRAM REQUEST FOR RELIEF

FOR

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NUMBER: 50-255

1.0 INTRODUCTION

The Code of Federal Regulations, 10 CFR 50.55a, requires that inservice inspection (ISI) of certain American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code applicable Edition and Addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i), or where alternatives have been approved pursuant to 10 CFR 50.55a(a)(3). With respect to proposed alternatives, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; or (2) compliance with the specified requirements in the regulation would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. NRC guidance contained in Generic Letter (GL) 90-09, *Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions*, provides alternatives to the Code requirements that are acceptable to the staff.

The NRC staff's findings with respect to the approval requested as part of the licensee's ISI program are contained in this safety evaluation (SE). This SE covers a proposed alternate snubber examination method, as described in Consumers Power Company's letter dated January 17, 1996. The licensee's ISI program is based on the requirements of Section XI of the ASME B&PV Code, 1989 Edition. The 1989 Edition of the ASME B&PV Code, Section XI, Subarticle IWF-5300, paragraph (a) requires that inservice snubber examinations be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 [Oma-1988 per 10 CFR 50.55a(b)(2)(viii)], using the VT-3 visual examination method described in paragraph IWA-2213.

2.0 AUTHORIZATION REQUEST

The licensee requests authorization or approval of an alternative to the visual inspection requirements of the ASME B&PV Code, Section XI, Subarticle IWF-5300, paragraph (a) for snubbers at the Palisades Nuclear Plant.

2.1 Basis for Request

Snubber visual examinations are currently performed under Palisades Technical Specification (TS) 4.16.1. TS 4.16.1 was previously amended to revise the visual inspection requirements to be consistent with the guidance contained in GL 90-09. The GL 90-09 alternative guidance would alleviate expenditure of unnecessary resources and reduce personnel radiological exposure for the Palisades Nuclear Plant snubber visual inspection program. The implementation of ASME/ANSI OMa-1988 would return the Palisades Nuclear Plant snubber examination program to the state that existed prior to the publication of GL 90-09, effectively cancelling the benefits afforded by the GL guidance.

The proposed alternative provides an acceptable level of quality and safety, and the same confidence level as NRC-approved OMa-1988, Part 4 requirements and will generally allow visual examinations and corrective action during plant outages.

2.2 Alternate Method

The licensee proposes, as an alternative to the visual examinations required by the ASME B&PV Code, Section XI, Subarticle IWF-5300, paragraph (a), to perform Palisades snubber visual inspections in accordance with TS 4.16.1.

Further, the visual examination acceptance criteria provided in ASME/ANSI OMa-1988, Part 4 will be used for the visual inspection results acceptance basis.

2.3 Evaluation

The staff developed GL 90-09, in part, to reduce unnecessary radiological exposure. GL 90-09 provides an alternate schedule for snubber visual inspections that maintains the same confidence level as the existing inspection intervals and allows for inspections and corrective actions during plant outages. The GL 90-09 guidance inspection interval is based on the number of unacceptable snubbers of the last inspection in proportion to the size of the various snubber populations or categories. The required current interval for visual inspection is based only on the number of unacceptable snubbers found during the last inspection without regard to the snubber population. Licensees with a large population of snubbers find that the visual inspections are excessively restrictive, expend a significant amount of resources, and subject plant personnel to unnecessary exposure. The visual inspection provides for detection of impaired functional ability caused by physical damage, leakage, corrosion, or degradation from environmental exposure or operating conditions. The staff determined that the visual inspection schedule of GL 90-09 is an acceptable alternative and encouraged licensees to change their TS to be consistent with this guidance.

By letter dated June 13, 1991, the licensee submitted a request for an amendment to Palisades TS 4.16.1 with regard to snubber surveillance. The amendment request revised the snubber visual examination requirements to be consistent with the guidance contained GL 90-09. By NRC letter dated June 12, 1992, the proposed change to the TS was approved and issued as Amendment No. 148 to the Facility Operating License No. DRP-20 for the Palisades Nuclear Plant.

The visual inspection requirements of TS 4.16.1 provide an acceptable level of quality and safety and are acceptable as an alternative to ASME B&PV Code, Section XI, Subarticle IWF-5300, paragraph (a) requirements.

3.0 CONCLUSIONS

The staff concludes that the licensee's proposal to perform the ISI program snubber inservice visual inspections in accordance with Palisades TS 4.16.1 in conjunction with the visual examination acceptance criteria of OMa-1988, Part 4 is acceptable as an alternate method to the inservice examination requirements of the ASME Boiler and Pressure Vessel Code, Subsection XI, Subarticle IWF 5300, paragraph (a). The staff has determined that the proposed alternative, pursuant to 10 CFR 50.55a(a)(3)(i), provides an acceptable level of quality and safety.

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