

A CMS Energy Company

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U.S. Nuclear Regulatory Commission
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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
RESPONSE TO CONCERN EXPRESSED IN INSPECTION REPORT
50-255/98006(DRS)**

Consumers Energy received NRC Inspection Report 50-255/98006(DRS) dated June 12, 1998, which reported the results of an inspection to determine if the Palisades Inservice Inspection (ISI) Program was being conducted in accordance with the applicable requirements. Within the Executive Summary of that report, the NRC stated:

"... the limited scope of the foreign object search and retrieval inspection of the secondary side of the steam generators demonstrated a less than comprehensive effort."

Consumers Energy agrees that the inspection performed was of very limited scope. A foreign object search and retrieval (FOSAR) inspection was not originally planned for the 1998 refueling outage. This decision was based on the successful results of the extensive secondary side manual and video inspections conducted during the 1996 refueling outage. However, when possible loose parts (PLPs) were identified during the eddy current examinations of the steam generator tubes in 1998, a limited FOSAR inspection was performed of the periphery of the tubesheet, where the majority of the PLPs were located. The limited FOSAR provided sufficient evidence to conclude that significant problems with loose parts have not occurred and that the scope of the FOSAR did not need to be expanded.


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As a part of the normal steam generator maintenance program, Consumers Energy is planning extensive FOSAR with remote and manual visual secondary side inspections and secondary side sludge lancing concurrent with eddy current testing during the 1999 refueling outage.

SUMMARY OF COMMITMENTS

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


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