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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT**
ADDITIONAL INFORMATION REGARDING DRAFT REPORT, "A STUDY OF AIR-OPERATED VALVES IN U.S. NUCLEAR POWER PLANTS"

In a letter dated July 30, 1999, Consumers Energy provided comments on two draft reports regarding air-operated valves. The reports contained some Palisades-specific information that had been collected during a November, 1997 site visit by NRC and contractor personnel. The comments identified a number of changes that were needed to make the reports accurately reflect the then-current conditions of the Instrument Air and High Pressure Air systems at Palisades. Recently, Dr. Harold Ornstein of the NRC staff requested the current status of several activities related to these air systems. This letter provides the requested information.

Appendix C of the draft INEEL report entitled "A Study of Air-Operated Valves in U.S. Nuclear Power Plants" lists several weaknesses in the Palisades Instrument Air and High Pressure Air systems. These weaknesses had been self-identified by the Palisades staff prior to the site visit during the development of the Compressed Air System Design Basis Document (DBD 1.05) and during a Safety System Design Confirmation of the air systems. To respond to identified weaknesses, the system engineer had prepared Action Plan 39. This action plan described a number of improvement actions for the Instrument Air and High Pressure Air systems. Subsequently, Action Plan 46 was also developed to move the actions for the High Pressure Air system into an action plan which was separate from the plan for the Instrument Air system. The following provides an updated status for three of the air system improvement items included in these action plans.

First, with two exceptions, Palisades has completed relocating the air filters on the high pressure air supplies for safety related valves to new positions upstream of the regulators. We plan to relocate the filters for two remaining safety related valves during



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the refueling outage in October, 1999. Second, a full capacity air dryer is being installed in the Feedwater Purity Building air system to assure it can supply dry air when it is used as a backup to the plant Instrument Air system. This modification is scheduled to be complete before the refueling outage in October, 1999. Finally, we plan to replace the refrigerant dryers in the High Pressure Air system with desiccant dryers. This modification is currently scheduled to be completed on one of the compressors during the first quarter of 2000, and on the remaining two compressors before the end of 2000.

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