

June 3, 1997

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
INSERVICE TESTING PROGRAM - VALVE RELIEF REQUEST 28

On March 5, 1996, Consumers Energy submitted its third 120-month interval inservice testing (IST) program for the Palisades Plant. On August 30, 1996, the NRC responded with their evaluation of the relief requests contained in that program. This evaluation reached the conclusion that valve relief request (VRR) No. 28 was denied.

A revised VRR No. 28 is attached for approval in accordance with the requirements of 10 CFR 50.55a(a)(3). This VRR has been revised to include the information missing in the March 5, 1996, submittal.

Approval of this VRR is requested prior to January 23, 1998, to allow planning for the 1998 refueling outage scheduled to commence in May, 1998.

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SUMMARY OF COMMITMENTS

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



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Manager, Licensing

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

Attachment

ATTACHMENT

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

INSERVICE TESTING PROGRAM - VALVE RELIEF REQUEST 28

3 Pages

**RELIEF REQUEST BASIS
NUMBER 28**

SYSTEM: Engineering Safeguards M-201-2
 Component Cooling M-209-2 & M-221-2

VALVES: RV-0402, RV-0403, RV-0954, RV-0955, and RV-2109

CATEGORY: C **CLASS:** 2 and 3

FUNCTION:

RV-0402 and RV-0403 provide tube side thermal overpressure protection for the Shutdown Cooling Heat Exchangers.

RV-0954 and RV-0955 provide shell side thermal overpressure protection for the Shutdown Cooling Heat Exchangers.

RV-2109 provides shell side thermal overpressure protection for the Spent Fuel Pool Heat Exchangers.

TEST REQUIREMENT:

The scope of OM-1987, Part 1 includes pressure relief devices that are required to perform a specific function in shutting down a reactor or in mitigating the consequences of an accident.

OM-1987, Part 1, Paragraph 1.3.4 requires periodic testing of Class 2 and 3 pressure relief devices.

- a. All valves of each type and manufacture shall be tested within each subsequent 10 year period.
- b. A minimum of 20% of the valves shall be tested within any 48 months.

BASIS FOR RELIEF:

Relief is requested in accordance with 10CFR50.55a(a)(3) from testing RV-0402, RV-0403, RV-0954, RV-0955, and RV-2109 on the basis that the proposed alternative will provide an acceptable level of quality.

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Complying with the Code is impractical. RV-0402, RV-0403, RV-0954, RV-0955, and RV-2109 are designed to protect the Shutdown Cooling Heat Exchangers and the Spent Fuel Pool Heat Exchangers from thermal expansion of water when the exchangers are isolated for maintenance or inspection. These thermal relief valves have no safety function when the heat exchangers are in service. The associated heat exchangers must be isolated to remove these thermal relief valves. However, the Shutdown Cooling Heat Exchangers cannot be isolated during power operations, nor isolated when there is fuel in the Reactor Vessel. An alternate means of cooling the Spent Fuel Pool would be required to isolate the Spent Fuel Pool Heat Exchangers.

Compliance would result in a hardship without a compensating increase in safety. RV-0402, RV-0403, RV-0954, and RV-0955 are welded in, and are located in a high radiation area. Removal testing and reinstallation would cause an increase of radiation exposure to plant staff. RV-0402, RV-0403, RV-0954, RV-0955, and RV-2109 do not provide overpressure protection when the associated heat exchanger is in service, nor do they serve a safety function during Plant operation to ensure the reactor can be safely shutdown or to mitigate the consequences of an accident. These relief valves are only needed when the associated heat exchanger is isolated. Therefore, there is no benefit in verifying the set point for these relief valves while the heat exchangers remain in service. In lieu of the 10-year periodic testing required by OM-1987, these relief valves will be tested on the basis of need during periods of isolation of the heat exchangers.

ALTERNATIVE TESTING:

Each time Shutdown Cooling Heat Exchanger E-60A is removed from service and isolated for maintenance or inspection, RV-0402 and RV-0954 will be tested in accordance with OM-1987, Part 1, Section 8 unless they have been tested within the last 48 months.

Each time Shutdown Cooling Heat Exchanger E-60B is removed from service and isolated for maintenance or inspection, RV-0403 and RV-0955 will be tested in accordance with OM-1987, Part 1, Section 8 unless they have been tested within the last 48 months.

Each time Spent Fuel Pool Heat Exchangers E-53A and E-53B are removed from service and isolated for maintenance or inspection, RV-2109 will be tested

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in accordance with OM-1987, Part 1, Section 8 unless it has been tested within the last 48 months.

ACCEPTANCE CRITERIA:

Acceptance Criteria for the testing of RV-0402, RV-0403, RV-0954, RV-0955, and RV-2109 shall be established in accordance with Palisades Nuclear Plant Permanent Maintenance Procedure MSM-M-60, "ASME Safety/Relief Valve Testing for Valves Included in ASME Section XI Scope."

Additional actions for valves that fail "As Found" set point testing are specified per Palisades Nuclear Plant Engineering Manual Procedure EM-09-02, "Inservice Testing of Plant Valves."

STATUS:

This relief request requires prior NRC approval in accordance with the provisions of 10CFR50.55a(a)(3).