

October 1, 1997

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
UPDATED REACTOR VESSEL FLUENCE SUBMITTAL - ADDITIONAL INFORMATION

This is to notify the NRC that Consumers Energy will be providing additional information regarding the methodology used by Consumers Energy to determine updated fluence values. Consumers Energy is in the process of hiring a number of recognized experts in the field of fluence determination to provide independent evaluations of the methodology used to determine the updated fluence values we have submitted for NRC staff review. We expect to present the results of these independent evaluations at a meeting with the NRC staff in December 1997 or January 1998.

In April 1996, Consumers Energy provided updated fluence values for the Palisades reactor vessel and requested NRC concurrence with the methodology used to derive those values. This information was further discussed with the staff at two meetings in 1996 which resulted in the NRC requesting additional information that was supplied by Consumers Energy in six additional submittals during 1996.

The foregoing resulted in an Interim SER issued in December 1996 which approved an 8% reduction of previously accepted fluence values using methodology based on more accurate reactor vessel physical measurements and determined that further evaluation was required for the methodology used to derive a proposed additional 17% reduction based on fluence measurement using incore and excore dosimetry.

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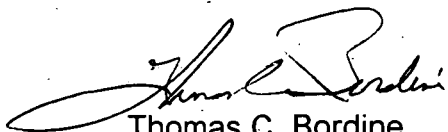


At a meeting on February 26, 1997, the Consumers Energy technical staff and the NRC technical staff met to further discuss the methodology Consumers Energy used to determine that the proposed 17% reduction in fluence value satisfies the requirements of 10CFR50.61 and Regulatory Guide 1.99. This meeting raised additional issues relative to the Consumers Energy methodology. Those issues were addressed in Consumers Energy's June 26, 1997, submittal.

It is our understanding that the NRC staff is now in the process of evaluating the new information presented in our June 26, 1997 submittal and reevaluating the information in our previous submittals. It is our further understanding that the NRC staff currently plans to complete this evaluation by February 1998. Therefore, it is our intent to present the results of the above described independent evaluations before the staff completes their review. We request that NRC withhold issuance of the final SER until the additional information is presented to the NRC.

SUMMARY OF COMMITMENTS

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



Thomas C. Bordine
Manager, Licensing

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Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades