

Mr. Thomas C. Bordine
Manager, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

October 17, 1997

SUBJECT: PALISADES PLANT - REQUEST FOR ADDITIONAL INFORMATION RELATED
TO CONSUMERS ENERGY COMPANY'S INSERVICE INSPECTION PROGRAM
RELIEF REQUEST RR-4 (TAC NO. M98925)

Dear Mr. Bordine:

Based on our review of your June 3, 1997, submittal, we have determined that we need additional information to complete our review of the subject inservice inspection program relief request. Please provide a response to the enclosed questions within 30 days of receipt of this letter. In addition, to expedite the review process, please forward a copy of your response to the NRC's contractor, the Idaho National Engineering and Environmental Laboratory (INEEL), at the following address:

Michael T. Anderson
INEEL Research Center
2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-2209

If you have any questions regarding this request, please contact me at (301) 415-1312.

Sincerely,

ORIGINAL SIGNED BY

Robert G. Schaaf, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: Request for Additional Information

cc w/encl: See next page

DISTRIBUTION

Docket File	PUBLIC
PD31 Reading	EAdensam
OGC	ACRS
GGrant, RIII	MJordan, RIII

DFD 1/1
NRC FILE CENTER COPY

DOCUMENT NAME: PAL98925.RAI

OFFICE	PM:PD31	E	LA:PD31	D:PD31	N
NAME	RSchaaf <i>RS</i>	CJamerson <i>CMH for</i>	JHannon		
DATE	10/16/97	10/16/97	10/17/97		

OFFICIAL RECORD COPY

9710290268 971017
PDR ADOCK 05000255
G PDR



Mr. Thomas C. Bordine
Consumers Energy Company

Palisades Plant

cc:

Mr. Thomas J. Palmisano
Site Vice President
Palisades Plant
27780 Blue Star Memorial Highway
Covert, Michigan 49043

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Palisades Plant
27782 Blue Star Memorial Highway
Covert, Michigan 49043

Mr. Robert A. Fenech, Sr Vice Pres
Nuclear, Fossil, and Hydro Operations
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201

Drinking Water and Radiological
Protection Division
Michigan Department of
Environmental Quality
3423 N. Martin Luther King Jr Blvd
P. O. Box 30630 CPH Mailroom
Lansing, Michigan 48909-8130

M. I. Miller, Esquire
Sidley & Austin
54th Floor
One First National Plaza
Chicago, Illinois 60603

Gerald Charnoff, Esquire
Shaw, Pittman, Potts and Trowbridge
2300 N Street, N. W.
Washington DC 20037

Mr. Thomas A. McNish
Vice President & Secretary
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201

Michigan Department of Attorney
General
Special Litigation Division
630 Law Building
P.O. Box 30212
Lansing, Michigan 48909

Judd L. Bacon, Esquire
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

Jerry Sarno
Township Supervisor
Covert Township
36197 M-140 Highway
Covert, Michigan 49043

Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

REQUEST FOR ADDITIONAL INFORMATION

REGARDING RELIEF REQUEST RR-4

PALISADES PLANT

ISI PROGRAM SUBMITTAL DATED JUNE 3, 1997

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components", to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during a 120-month inspection interval comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to Nuclear Regulatory Commission (NRC) approval.

By letter dated June 3, 1997, the licensee submitted two requests for relief from the requirements of the ASME Section XI Code. The available information provided by the licensee has been reviewed by the NRC staff.

2. Additional Information Required

Based on the above review, the staff has concluded that the following information and/or clarification is required to complete the review of the June 3, 1997, submittal:

- A. Based on the initial review of the Request for Relief No. RR-4, the staff has concluded that either (a) the appropriate paragraph of the Regulations has not been cited, or (b) the regulatory basis has not been adequately supported. Request for Relief RR-4 was submitted pursuant to 10 CFR 50.55a(a)(3) for examinations performed to the extent practical. This request should be reviewed for the correct paragraph of the Regulations to ensure that the request is evaluated in accordance with the appropriate criteria, as discussed below.

The Regulations provide that a licensee may propose an alternative to CFR or Code requirements in accordance with 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii). Under 10 CFR 50.55a(a)(3)(i), the proposed alternative must be shown to provide an acceptable level of quality and safety, i.e., essentially, be equivalent to the original

Enclosure

requirement in terms of quality and safety. Under 10 CFR 50.55a(a)(3)(ii), the licensee must show that compliance with the original requirement results in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Examples of hardship and/or unusual difficulty include, but are not limited to, excessive radiation exposure, disassembly of components solely to provide access for examination, and development of sophisticated tooling that would result in only minimal increases in examination coverage.

A licensee may also submit a request for relief from ASME requirements. In accordance with 10 CFR 50.55a(g)(5)(iii), if a licensee determines that conformance with certain Code requirements is impractical for its facility, the licensee shall notify the Commission and submit, as specified in §50.4, information to support that determination. When a licensee determines that an inservice inspection requirement is impractical, e.g., the examination is limited by physical restrictions and the component would have to be redesigned or replaced to enable inspection, the licensee should cite 10 CFR 50.55a(g)(5)(iii). The NRC may, giving due consideration to the burden placed on the licensee, impose an alternative examination requirement.

- B. For Request for Relief No. RR-4, the coverage calculations contained in the attached EPRI report are presented in terms of head-side, boss-side and skew angles. It is assumed that these designations represent the four Code-required examination directions (2 axial and 2 circumferential). However, these designations are confusing when considering the circumferential scan directions and the cumulative coverage for the welds. Provide clarification regarding the coverage summary and, if possible, a cumulative coverage for the nozzle-to-vessel welds.

The schedule for timely completion of this review requires that the licensee provide the above requested information and/or clarifications within 30 days of receipt of this request for information.