



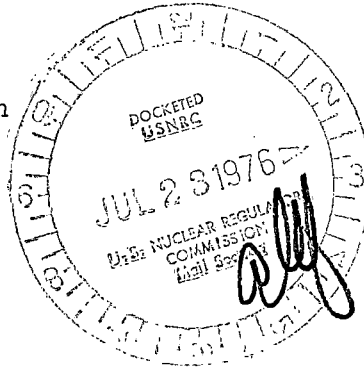
**Consumers
Power
Company**

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

July 20, 1976

Director of Nuclear Reactor Regulation
Att: Mr Albert Schwencer
Operating Reactor Branch No 1
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255, LICENSE DPR-20
PALISADES PLANT, INSERVICE INSPECTION



By letter dated June 11, 1976 we responded to questions concerning the Inservice Inspection program at our Palisades Plant. Since that time we have had the opportunity to discuss this program and our interpretation of applicable parts of 10 CFR 50.55a with members of your staff. The following items appear to need additional clarification; our interpretation is presented below:

Item 1, Acceptable Additions of Criteria, Codes and Standards

Paragraph 10 CFR 50.55a(g)(4)(ii) states, "The inservice examinations conducted during successive 40-month periods throughout the service life of the facility thereafter shall comply with those requirements in editions of the code and addenda in effect no more than 6 months prior to the start of each 40-month period." We further note that Footnote 4 appears to define "in effect" as follows: "ASME and United States of America Standard Code Addenda are considered 'in effect' 6 months after their date of issue."

From the above we conclude that any edition of Section XI of the ASME Boiler and Pressure Vessel Code that is "in effect" no more than 6 months prior to the start of the 40-month period is acceptable.

Based on this conclusion, we are currently revising our Inservice Inspection program to meet the requirements, to the extent practical, of Section XI through the summer of 1976 addenda. We believe that this is the proper course of action since this addenda will be in effect soon after the beginning of our inspection program's second 40-month interval. To plan an additional revision of our Inservice Inspection program at the start of the next 40-month interval would appear to incur significant unnecessary additional costs.

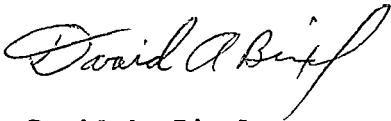
If this interpretation of 10 CFR 50.55a is not corrected, we request an exemption from this part to permit use of Section XI through the summer of 1976 addenda.

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Item 2, Application for Amendment of the Technical Specifications
at Least 6 Months Before the Start of the Period During Which the
Provision Became Applicable

Paragraph 10 CFR 50.55a(g)(5)(ii) appears to limit the time when an amendment to the Technical Specifications can be requested. We noted in our June 11, 1976 letter that since unforeseen circumstances may prevent inspection as originally planned, we may not be able to anticipate all required Technical Specifications amendments 6 months in advance. This letter requested an exemption from the application time requirement of 10 CFR 50.55a(g)(5)(ii). We would further like to clarify that this request was for plant life.

If this interpretation is incorrect, please advise us of the proper interpretation. We would reevaluate our exemption request based on your clarification of the present meaning of this paragraph.



David A. Bixel
Assistant Nuclear Licensing Administrator

CC: JGKeppler, USNRC