## U. S. NUCLEAR REGULATORY COMMISSION CONSUMERS POWER COMPANY DOCKET NO. 50-255 ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption to Provisional Operating License No. DPR-20, issued to Consumers Power Company (the licensee), for operation of the Palisades Plant, located in Van Buren County, Michigan.

## ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action: The exemption, proposed by letter dated August 25, 1989, would provide partial relief from the requirement of Paragraph III.D.2.(b)(ii) to leak test, at or above the calculated design basis accident peak containment pressure (Pa), containment air locks which were opened during a period when containment integrity was not required. The exemption would permit the substitution of a between-the-seals leak test at reduced pressure but not less than 10 psig provided that no maintenance, modification, or other activity has been performed which could affect the the sealing capability of the air locks.

The Need for the Proposed Action: Whenever the facility is in cold shutdown, containment integrity is not required. If during this time an air lock door is opened, an overall air lock test at Pa must be performed prior to leaving the cold shutdown condition to comply with Paragraph III.D.2.(b)(ii) of Appendix J to 10 CFR Part 50. The air lock door designs are such that a test at Pa of the entire air lock can be performed only with structural bracing (strongbacks)

installed on the inner door. These strongbacks are needed because the pressure exerted on the inner door during the test is in the reverse direction to the pressure exerted during accidents. In contrast to the requirements of the referenced paragraph, Paragraph III.D.2.(b)(iii) of Appendix J to 10 CFR Part 50 permits testing of containment air locks that have been opened during periods when containment integrity is required by the technical specifications to be tested by the alternate method described above.

There is no reason to expect an air lock to leak excessively merely because a door was opened during cold shutdown or refueling vice during other operating conditions, provided there has been no maintenance, modification, or other activity that could affect the leak-tightness or sealing capability of the air lock. The alternate testing permitted by the proposed exemption will prove air lock integrity following cold shutdown or refueling in the same manner that the air lock is proven during periods when containment integrity is required. The proposed exemption is required to allow the licensee to conduct the alternate air lock testing as described above.

Environmental Impacts of the Proposed Action: The Commission has evaluated the environmental impact of the proposed exemption and has determined that the probability of accidents has not been increased by the proposed alternative testing, and that post-accident radiological releases would not be greater than previously determined. Further, the Commission has determined that the proposed exemption does not affect routine radiological plant effluents or occupational radiological exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with this proposed exemption.

With regard to potential non-radiological impacts, the proposed exemption involves features located entirely within the restricted area as defined in 10 CFR Part 20. It does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant non-radiological environmental impacts associated with the proposed exemption.

Alternative to the Proposed Action: Since the Commission has concluded that the environmental effects of the proposed action are not significant, any alternative with equal or greater environmental impact need not be evaluated.

The principal alternative would be to deny the requested exemption. This would not reduce the environmental impact attributable to this facility and would result in a larger expenditure of licensee resources to comply with the Commission's regulations.

Alternative Use of Resources: This action does not involve the use of resources not previously considered in the Final Environmental Statement related to operation of the Palisades Plant dated February 1978.

Agencies and Persons Consulted: The Commission's staff reviewed the licensee's request and did not consult other agencies or persons.

## FINDING OF NO SIGNIFICANT IMPACT

Based upon the foregoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed exemption.

For further details with respect to this action, see the application for exemption dated August 25, 1989, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, NW., Washington, DC 20555 and at the Van Zoeren Library, Hope College, Holland Michigan 49423.

Dated at Rockville, Maryland, this 29th day of November 1989.

FOR THE NUCLEAR REGULATORY COMMISSION

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