



CONSUMERS
POWER
Company

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

November 9, 1972

Mr. Boyce H. Grier, Regional Director
Directorate of Regulatory Operations
US Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Docket No 50-155
and
Docket No 50-255

Dear Mr. Grier:

Since receiving your letter of June 29, 1972 concerning minimum valve wall thickness verification, Consumers Power Company has investigated the possible alternatives available to demonstrate acceptable valve wall thicknesses at the Palisades and Big Rock Point Plants. This letter will inform you of our future plans.

Valves located within the reactor pressure boundary (as defined in your June 29, 1972 letter) at the Palisades Plant shall be inspected to establish wall thickness, using ultrasonic examination techniques. The inspection program will consist of one valve of each type (check, gate, globe, etc) size and rating for each valve manufacturer. If inspection reveals a valve having a wall thickness deficiency, all valves of that manufacturer within the reactor pressure boundary will be examined.

The accuracy of ultrasonic measurements will be that determined from calibration blocks. The material used as a calibration block will be representative of the valve material being measured. Best efforts will be extended to insure that equipment, techniques and procedures are capable of producing a measurement error of 2% or less with respect to the actual calibration block dimensions.

It is possible that some stainless steel valves will have a metallurgical structure such that acoustic measurement to a high degree of precision is impossible to achieve. In such cases, wall thickness measurements will not be performed.

Minimum wall thickness requirements will be established based on the following codes as they are applicable to the specific installation: ASA B31.1 (1955), USAS B31.1.0 (1967), USAS B16.5 and MSS-SP-66.

8101100797

W. Boyce H. Grier
Docket No 50-155 and
Docket No 50-255
November 9, 1972

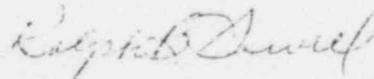
2

The inspections described above can only be performed during a prolonged reactor shutdown. These inspections will commence during the first scheduled Palisades refueling outage, September 1973, and will be completed by November 1975.

Wall thickness examination of valves installed in the Big Rock Point Plant is deemed unnecessary. Approximately 10 years of operating the primary system at pressures of 1350 psia and above plus numerous operating pressure (cold) hydrostatic tests have not revealed any indication of valve leakage or failure caused or contributed to by inadequate valve wall thickness.

Since Big Rock was designed for reactor operation at 1500 psia, valve procurement specifications frequently provided for valves rated substantially higher than the service conditions actually imposed. Records indicative of this fact will be available for your review at Big Rock Point subsequent to December 1, 1972.

Yours very truly,



Ralph B. Sewell
Nuclear Licensing Administrator

RBS/map