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Operation Reactor Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - SEP TOPIC VI-4, CONTAINMENT ISOLATION SYSTEMS

By letter dated June 9, 1981, the NRC issued a draft evaluation of SEP Topic VI-4 for the Palisades Plant. Since that time, Consumers Power Company has addressed various aspects of this topic in letters dated August 10, 1981 and January 4, 1982 and several discussions have been held with the NRC. The issues have now been clarified and refined to the point where the staff's concerns can be addressed in more specific detail. Therefore, the attached additional comments are provided to more fully address conclusions VI.3 and VI.7 in the June 9, 1981 letter, and to provide information on modifications recently completed on some of the penetration.

We trust that this information will assist in the resolution of the remaining concerns.

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ATTACHMENT - 7 Pages

A035
S.1

PALISADES PLANT

Additional Comments on NRC Evaluation of

SEP TOPIC VI-4

1. As a general comment, the use of threaded caps is allowed on lines which penetrate containment. This was previously stated in CPCo letter dated August 10, 1981. Specific reference is made to the 1980 edition of the ASME B&PV Code, Section III, Art. NE-3367 in addition to the design requirements for Class 2 piping contained in earlier code editions.

2. Penetration 13 - This service water line is continuously pressurized during operating and under accident conditions to a pressure greater than containment design pressure. The service water system is defined as an essential system and is seismically qualified inside containment. Use of branch line caps in this system, and particularly the question of welded vs threaded caps is immaterial since this portion of the system is effectively being pressure tested on a continuous basis.

3. Penetration 17 and 17a - Attached is a sketch showing the configuration of these penetrations following recent plant modifications. Previous NRC concerns are no longer applicable.

4. Penetration 21 and 21a - Attached is a sketch showing the configuration of these penetrations following recent plant modifications. Previous NRC concerns are no longer applicable.

5. Penetration 25 - The capped line is a 1" line. The cap is tested during Integrated Leak Rate Tests under Appendix J and Palisades Technical Specification 4.5.1.

6. Penetration 27 - The cap is the third isolation barrier. This penetration up to and including the blank flange is tested during Local Leak Rate Tests under Appendix J and Palisades Technical Specification 4.5.2.

7. Penetration 28 - Attached is a sketch showing the configuration of this penetration following recent plant modifications. Previous NRC concerns are no longer applicable.

8. Penetration 29 - The cap on this penetration is welded.

9. Penetrations 38 and 39 - The caps at these penetrations are on 1" lines. These are tested during Integrated Leak Rate Tests under Appendix J and Palisades Technical Specification 4.5.1.

10. Penetration 48 - Attached is a sketch showing the configuration of this penetration following recent plant modifications. Previous NRC concerns are no longer applicable.

11. Penetration 73 - This penetration was recently modified to route a new auxiliary feedwater supply line into containment. The previous cap/blank flange configuration no longer exists. Previous NRC concerns are therefore no longer applicable.

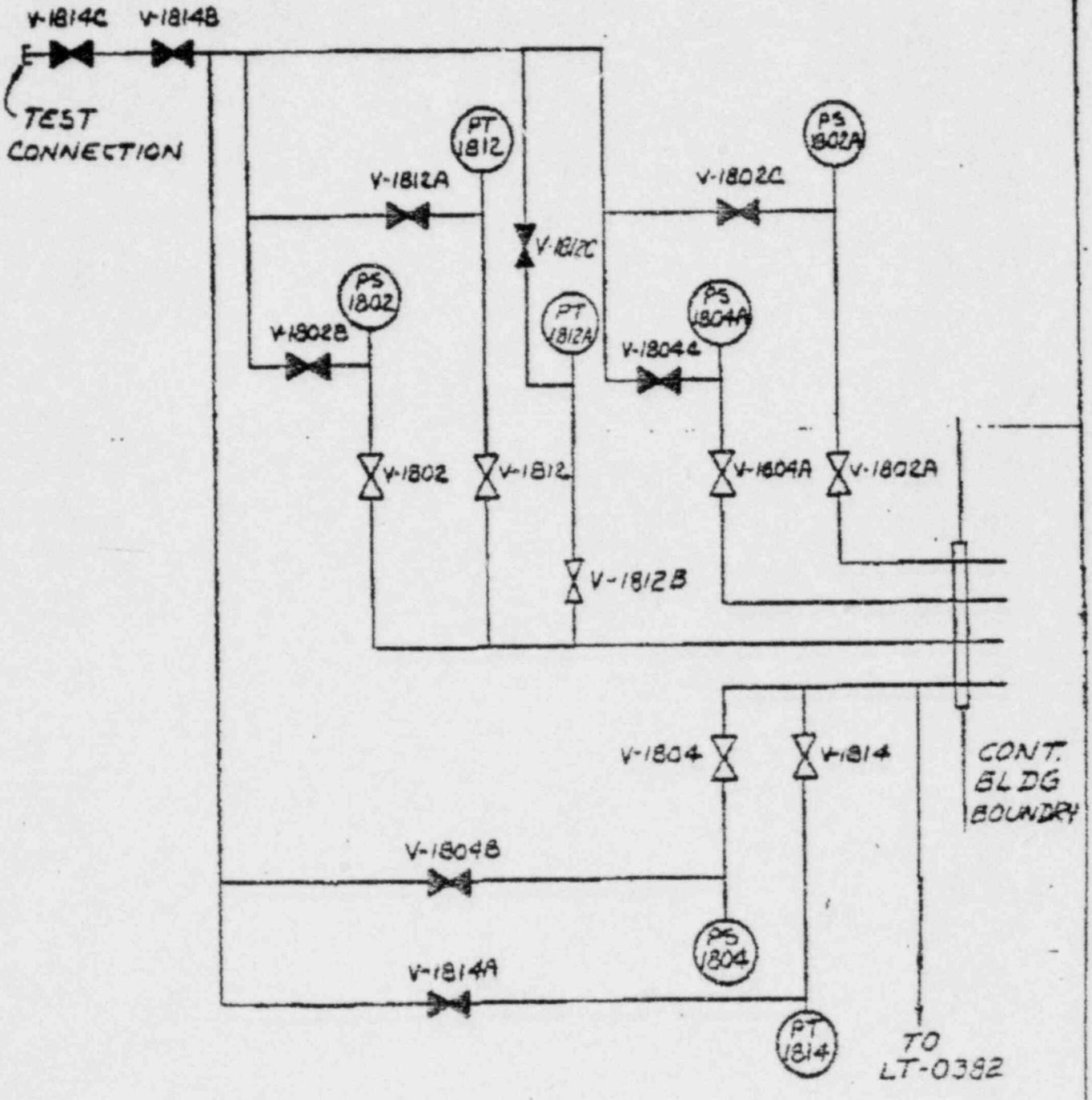
12. Penetration 18 - The blank flanges on this penetration are tested during Local Leak Rate Tests under Appendix J and Palisades Technical Specification 4.5.2.

13. Penetration 19 - The personnel air lock has several small capped lines. In no case however, is a single cap the only isolation barrier between the interior and exterior of containment. These caps and the threaded connections in the pressurization line through the outer air lock wall are all routinely pressure tested during the Local Leak Rate Tests performed under Appendix J and Palisades Technical Specification 4.5.2.

14. Penetration 50 - The emergency air lock has several small capped lines. In no case, however, is a single cap the only isolation barrier between the interior and exterior of containment. These caps are all routinely pressure tested during the local leak rate tests performed under Appendix J and Palisades Technical Specification 4.5.2.

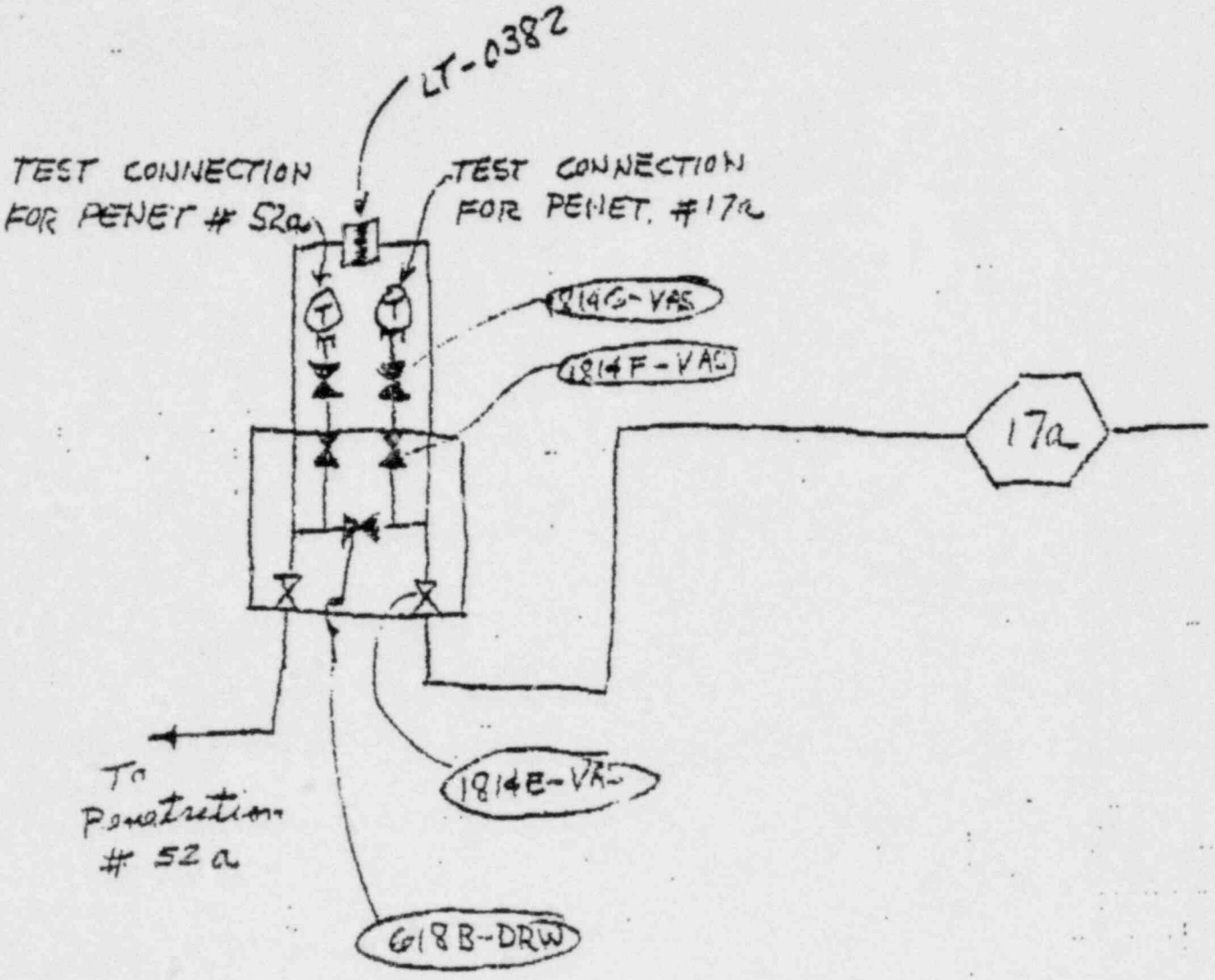
15. Penetration 51 - This 1/4" line provides access to the annulus between the double seals on the equipment hatch. These seals are tested after each opening of the equipment hatch during Local Leak Rate Tests under Appendix J and Palisades Technical Specification 4.5.2.

PEN 17 SCHEMATIC FOR LLRT

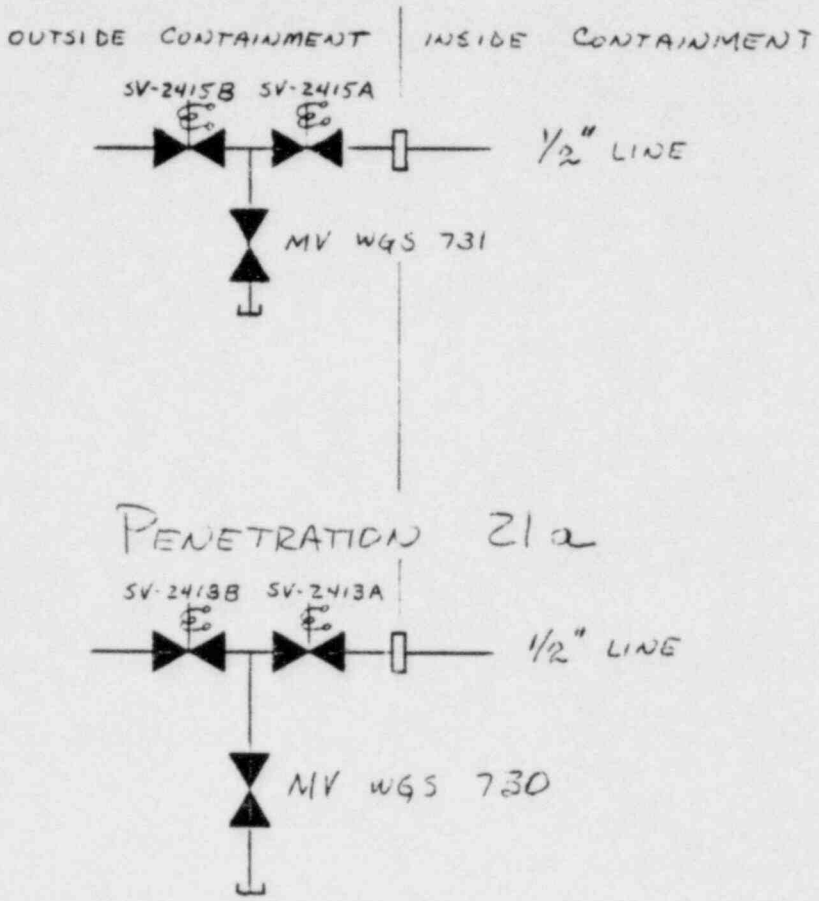


ALL VALVES ARE VAS VALVES

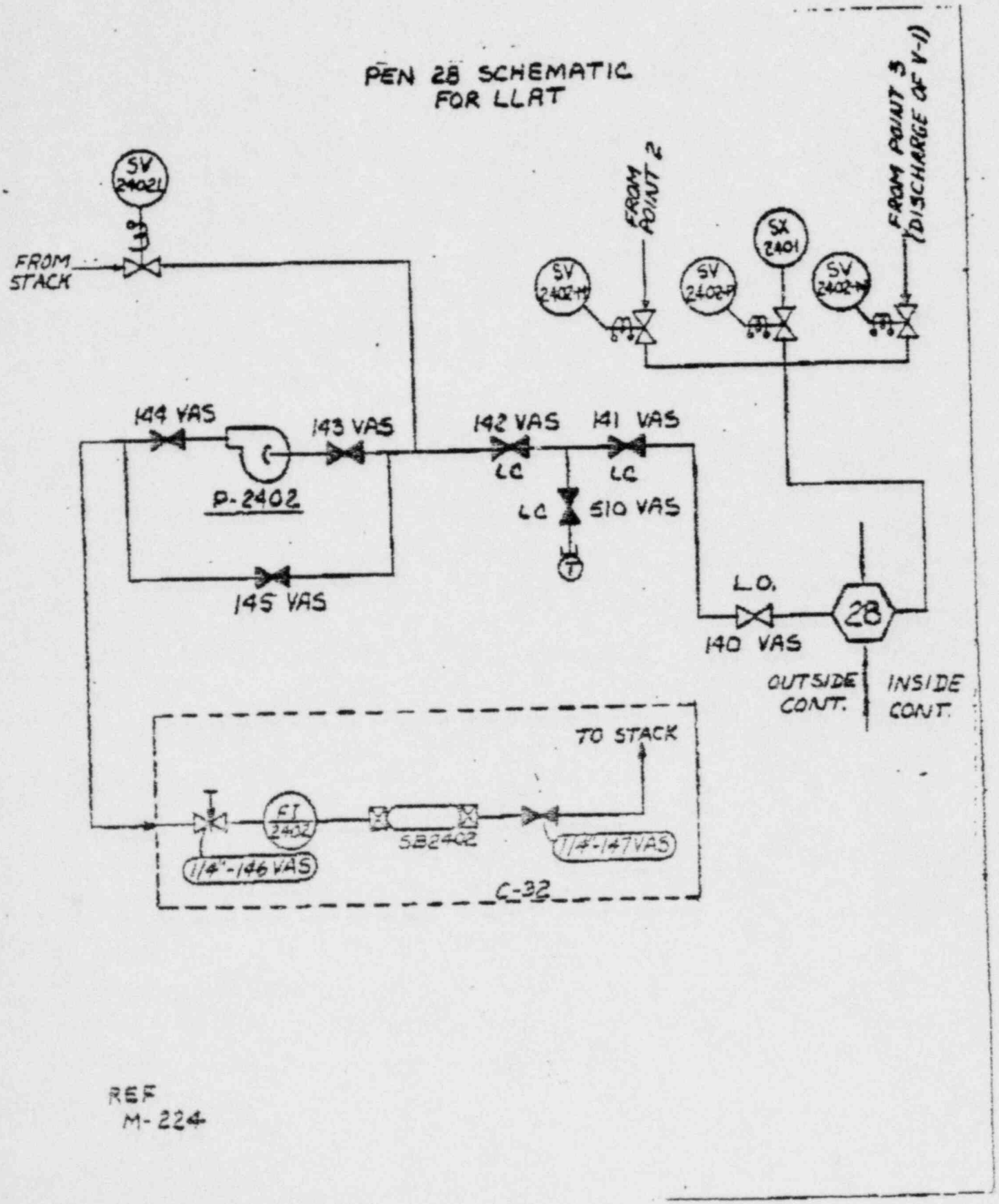
Penetration 17a Schematic for LLRT



PENETRATION 21



PEN 28 SCHEMATIC FOR LLAT



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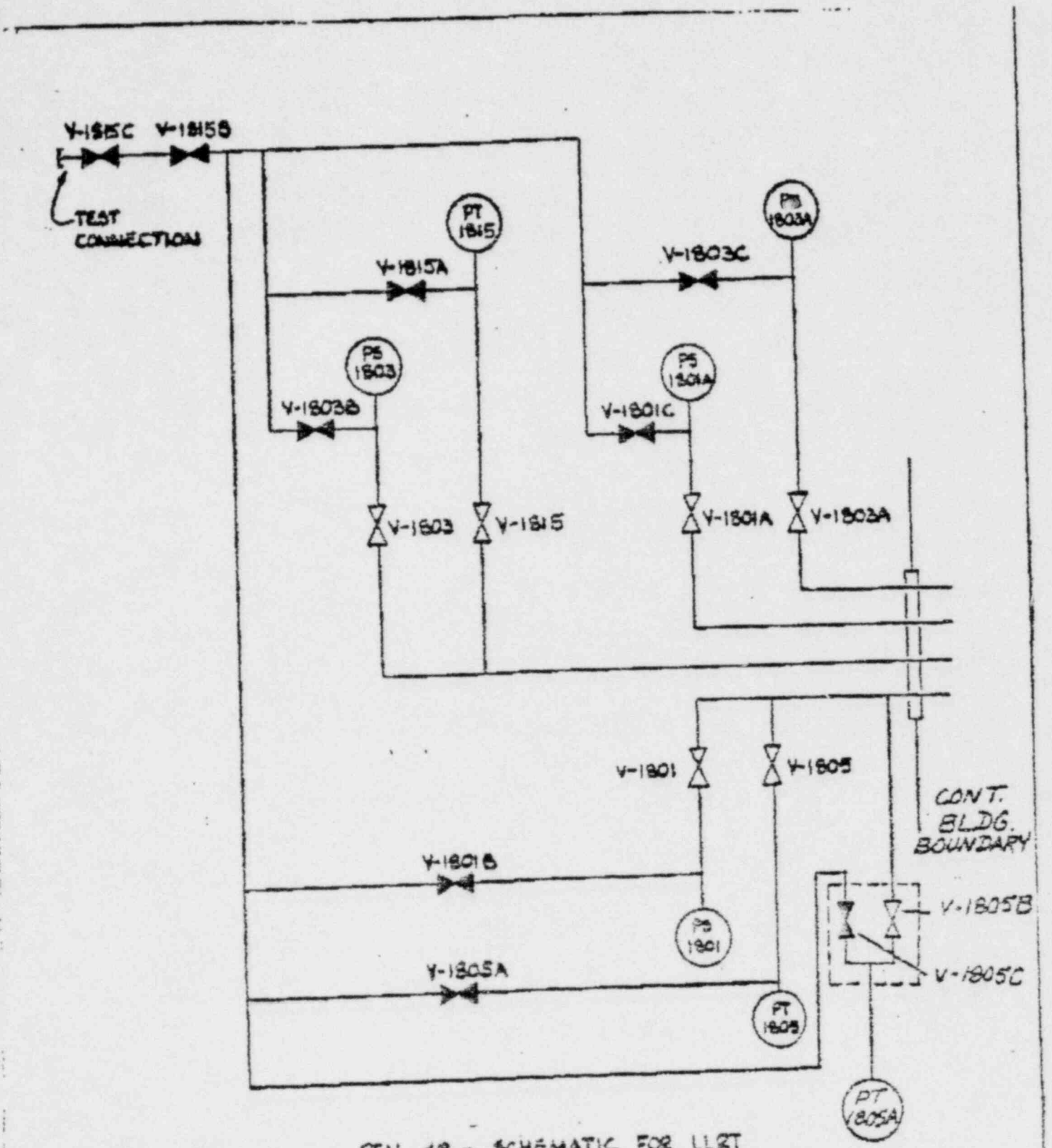

PEN. 48 - SCHEMATIC FOR LLRT
(ALL VALVES ARE VAS VALVES)