



Consumers
Power
Company

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April 8, 1982

Harold R Denton, Director
Office of Nuclear Reactor Regulation
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND PROJECT
MIDLAND DOCKET NOS 50-329, 50-330
REVISED RESPONSE TO ITEM II.D.1 OF NUREG-0737
FILE: 0505.805 SERIAL: 16598



ENCLOSURE (1): Revised Response to Item II.D.1 of NUREG-0737

As discussed with Harold Gregg of MEB, CP Co is revising the response to NUREG-0737, Item II.D.1. The revised response will be included in the next FSAR revision and commits CP Co to provide the NRC with Midland plant specific submittals for safety and power operated relief valve (PORV) qualification, PORV block valve qualification and SV/PORV discharge piping support evaluation by Unit 2 fuel load as required by Enclosure 2 of NUREG-0737. In addition, the block valves will be operationally tested during hot functional testing. Enclosed is a copy of the revised response for Item II.D.1 of NUREG-0737.

We believe the response provided in this letter will assist the Staff in writing the SER for Item II.D.1 of NUREG-0737.

James W. Cook

JWC/PEP/fms

CC RJCook, Midland Resident Inspector
RHernan, US NRC
FCherny, US NRC
DBMiller, Midland Construction (3)
RWHuston, Washington

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RESPONSES TO POST-TMI-2 ISSUES AND EVENTS

PART I
NUREG-0737 RESPONSESItem II.D.1 - Relief Valve Testing RequirementsResponse

As a sponsor of the EPRI PWR Safety and Relief Valve Test Program, Consumers Power Company intends to comply with the recommendations of NUREG-0578, Item 2.1.2 as implemented by NUREG-0660, Item II.D.1 and clarified by NUREG-0737, Item II.D.1. A letter by R.C. Youngdahl of Consumers Power Company, December 15, 1980, provides the current PWR utilities' positions on NUREG-0737, Item II.D.1 clarifications. Those positions are contained in the following synopses.

- a. Safety and Relief Valves and Piping: The EPRI program Plan for Performance Testing of PWR Safety and Relief Valves, Revision 1, July 1, 1980, provides a generic program and data from which CP Co can satisfy the NRC requirements.
- b. Block Valves: The EPRI program has not formally included the testing of block valves. However, a small number of block valves have been tested at the Marshall Steam Station Test facility. The PWR utilities and EPRI cannot provide a detailed block valve test program until results of the Wyle and CE relief valve tests are available. The PWR utilities and EPRI believe that the proper operation of the TMI-2 and Crystal River block valves and other operational experience, plus knowledge of the Marshall tests, support a less hurried and more rational approach to block valve testing.

Each Midland Unit has two block valves (one manufactured by Anchor Darling and one by Target Rock) in series upstream of the PORV. CP Co intends to perform operational steam testing of each valve during hot functional testing to provide evidence that the block valves can be operated, at normal operational pressure and temperature, ie, closed and opened at full D/P and at full flow.

- c. Anticipated Transient Without Scram (ATWS) Testing - PWR utilities will not support additional efforts for ATWS testing until regulatory issues are resolved. The major safety and relief valve test facility (CE) is complete and some measures were taken to provide additional test capability beyond the current program requirements. The NRC should recognize the results from the current program are likely to provide most of the information necessary to address ATWS events (ie, relief capability at high pressures).

MIDLAND 1&2-FSAR
RESPONSES TO POST-TMI-2 ISSUES AND EVENTS

PART I
NUREG-0737 RESPONSES

The Midland power-operated relief valve (PORV) is manufactured by Target Rock, is safety grade and is basically the same valve as the one tested by EPRI at the Marshall and Wyle facilities. A preliminary review of the Target Rock PORV test results contained in the EPRI PWR Safety and Relief Valve Test Program Interim Data Report (July 1981), indicates that this valve performed satisfactorily for all tests with one exception. This exception, Test 7-TR-7W performed at the Wyle facility, had a loop seal configuration upstream of the PORV. The piping layout at Midland includes a continuous downward slope of the piping from the PORV to the pressurizer and does not include a loop seal.

Based on the preliminary review of the generic program results and subject to the issue of the B&W Test Condition Justification Report, CP Co believes that the EPRI program confirms the adequacy of the PORV.

The Midland pressurizer safety valves are 2½ x 6 inch Dresser 31739A models with a short inlet configuration. The EPRI test results for this valve are still being reviewed and evaluated.

CP Co will provide, before fuel load, the Midland plant specific submittals for safety and relief valve qualification, piping and support evaluation and block valve qualification, as required by Enclosure 2 to NUREG-0737.

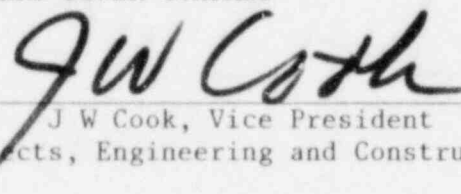
CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 16598 Dated April 8, 1982

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits a revised FSAR response to NUREG-0737, Item I.D.1, Relief Valve Testing Requirements.

CONSUMERS POWER COMPANY

By


J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 5 day of April 1982



Notary Public

Jackson County, Michigan

My Commission Expires

September 8, 1984