



Consumers  
Power  
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

July 13, 1984

Dennis M Crutchfield, Chief  
Operating Reactor Branch No 5  
Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - RESPONSE TO IE BULLETIN 84-02 "FAILURE OF GENERAL ELECTRIC  
TYPE HFA RELAYS IN USE IN CLASS 1E SAFETY SYSTEMS

IE Bulletin 84-02 dated March 12, 1984 requested that the GE Type HFA relays installed in electrical systems at plants in operation, be identified and replaced with Century Series HFA relays or Century Series Tefzel coil spools or equivalent in a prioritized replacement schedule.

Consumers Power Company's Palisades Plant has approximately 177 safety and non-safety related HFA relays. It is our intent to replace all of the Nylon/Lexan operating operation coils with Century Series types utilizing the following priorities:

Priority

- 1 Replace coils in all normally energized relays that presently have Lexan coils. This includes safety and non-safety related devices, both AC and DC. This work was completed prior to startup from the present refueling outage.
- 2 Replace coils in all of the normally de-energized relays in 125 volt DC circuits that presently have nylon coils. This will include only safety related devices.
- 3 Replace coils in the balance of the relays.

By using the above priorities, IE Bulletin 84-02 action requirements for Plants in Operation are satisfied. Because the normally energized relays in safety circuits, including reactor protective systems, were replaced prior to startup, no justification for continued operation is required. The balance of the safety related relays will be replaced by December 31, 1985.

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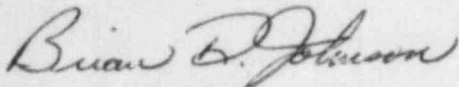
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DMCrutchfield, Chief  
Palisades Plant  
RESPONSE TO IEB 84-02  
July 13, 1984

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IE Bulletin 84-02 also requested licensees to review the general concerns expressed in the bulletin for applicability even if the identified relays were not used at the facility. This request was explained by the example, "if a different type of relay is used for the same safety functions described in this bulletin, or relays with similar materials are used for other safety-related functions, past operating history and manufacturers' recommendations should be reviewed to determine if additional action is appropriate." With regard to this request, Consumers Power Company reviewed IE Information Notice 84-20 which identified potentially significant problems pertaining to the service life of relays in safety-related systems. These identified relays were Agastat GP Series Relays and GTE Sylvania AC Relays. Our review indicated that neither relay is used in safety-related systems at the Palisades Plant and thereby do not present any problems.



Brian D Johnson  
Staff Licensing Engineer

CC Administrator, Region III, USNRC  
NRC Resident Inspector - Palisades

CONSUMERS POWER COMPANY

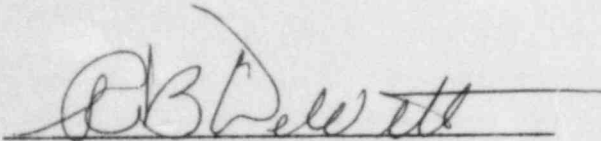
Palisades Plant  
Docket 50-255 - License DPR-20

REPOSE TO IE BULLETIN 84-02

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 Rule and Regulations thereunder, Consumers Power Company submits our response to IE Bulletin 84-02 dated March 12, 1984 entitled, "Failure of General Electric Type HFA Relays in Use In Class 1E Safety Systems." Consumers Power Company's response is dated July 13, 1984.

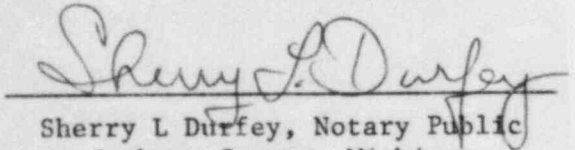
CONSUMERS POWER COMPANY

By



R B DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 13th day of July 1984.



Sherry L Durfey, Notary Public  
Jackson County, Michigan

My commission expires November 5, 1986.

**SHERRY LYNN DURFEY**  
Notary Public, Jackson County, Mich.  
My Commission Expires Nov. 5, 1986