



**Consumers  
Power  
Company**

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**Kenneth W Berry**  
Director  
Nuclear Licensing

February 17, 1986

James G Keppler, Administrator  
Region III  
US Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
RESPONSE TO IE INSPECTION REPORT 85-030

One item of noncompliance was identified in Inspection Report 85-030 dated January 16, 1986. The following is our response to that item:

NONCOMPLIANCE (50-255/85-030-01)

10CFR50.72(b)(2)(i) requires reporting within four hours, an event discovered during plant shutdown conditions, which had it been found during reactor operation, would have constituted serious degradation of principal safety barriers.

Technical Specification 4.5.2 requires containment local leak rates to be less than  $0.6L_a$  (65,200 sccm).

Contrary to the above, testing performed on December 4, 1985, determined that the local leak rate for a containment penetration (78,913 sccm) exceeded  $0.60L_a$ , December 16, 1985.

DISCUSSION:

A review was performed of the circumstances related to this violation. As a result of this review, we have determined that additional information should be provided for this event.

In general, local leak rate testing requires a unique method of administration with respect to the evaluation of test results. Typically, the necessary analysis and accumulation of individual test results is of sufficient complexity that a specific engineer must be assigned these responsibilities. As a result, this engineer must also determine the point at which an allowable leakage limit is exceeded.

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February 17, 1986

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Testing performed on December 4, 1985, determined a leak rate that exceeded the guideline values specified in the test procedure. Exceeding these guideline values indicated that a potential problem existed, but without further data reduction, the actual leakage could not be determined.

As a result of the high leak rate, the need for containment integrity was evaluated and determined to be unnecessary. The completed test was subsequently assigned to the appropriate engineer for further evaluation. On December 16, 1985, the responsible engineer determined that the test results exceeded the allowable leakage limit.

As a result of our evaluation of this occurrence, we have determined that a period of time is necessary to allow for an accurate assessment of the results of leak rate tests by the assigned engineer. We also understand the requirement of 10CFR50.72(b)(2)(i) regarding reporting within four hours, an event discovered during plant shutdown conditions, which, had it been found during reactor operation, would have constituted serious degradation of principal safety barriers. Therefore, we have determined that guidelines that represent a potential for failure of the 0.6L Technical Specification limit should be added to the surveillance procedure. Upon exceeding this guideline, the Shift Supervisor will be required to make a telephone report to the NRC ensuring full compliance with the requirements of 10CFR50.72(b)(2)(i).

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE

Guidelines, that represent a potential for failure of the 0.6L Technical Specification limit, will be added to the surveillance procedure. In conjunction with these guidelines, a requirement will be added to the surveillance procedure to complete the immediate notification requirements of 10CFR50.72.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved by August 1, 1986.

*Kenneth W Berry*

Kenneth W Berry  
Director, Nuclear Licensing

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