ATTACHMENT

Consumers Power Company
Palisades Plant
Docket 50-255

LOCAL LEAK RATE TESTING

CORRECTIVE ACTION PLAN

June 30, 1986

4 Pages

Palisades Nuclear Plant

Local Leak Rate Testing (LLRT)

Corrective Action Plan

I. Problems:

A. During the 1978, 1981, 1984 and 1986 Refueling Outages, the Palisades LLRT Leakage exceeded .6 La.

B. Palisades failed the ILRT "as found" condition during the 1981 and 1986 refueling outages due to the excessive penalty addition from Type B and Type C testing.

II. Root Cause of Problem

A. Containment isolation valve leakage.

B. Inconsistent testing methodology.

C. Inability to trend penetration/valve performance.

III. Objectives of Corrective Action Plan

A. Determine through historical review which valves have contributed an excessive amount of leakage during the performance of LLRT.

B. Determine through historical review which valves have shown a history of minimal or no leakage.

C. Develop LLRT trending to track penetration/valve performance.

D. Determine and implement an appropriate method of instructing test personnel.

E. Ensure Operations personnel provide a comprehensive and timely review of all LLRT procedures.

IV. Corrective Action - LLRT Program

A. Augmented LLRT Program

1. During any forced outage greater than 30 days, perform LLRT on penetrations which trending program indicates could exceed penetration leak rate acceptance criteria.

B. Local Leak Rate Testing

2. Develop/Implement detail trending program to track penetration/valve performance.

C. Identification of Valve Type/Valve Manufacturer

1. Identify valve type/valve manufacturer utilizing historical data of valves which have contributed an excessive amount of leakage during the performance of LLRTs.

2. Identify valve type/valve manufacturer utilizing historical data of valves which have shown a history of "minimal or no leakage" during the performance of LLRTs.

D. Correction of Problem Penetrations

1. Recommend/Implement effective repair/replacement methods on containment isolation valves identified as historically poor performers (excessive leakage) utilizing the data obtained in Item IV.C.1 & 2.

V. LLRT Method Improvement

A. Identify dedicated, cognizant Operations personnel to perform LLRTs.

B. Implement a thorough and complete Operations review of all LLRT procedures.

C. Review of LLRT procedures by LLRT engineer for testing methodology.

D. Initiate discussions with other utilities and INPO to benefit from their experience.

VI. Completion Schedule of Corrective Action Plan

Title	Item	Completion Date
Local Leak Rate Trending	IV.B.1	Completed June 2, 1986
Identification of Valve Type/Valve Manufacturer	IV.C.1, 2	October 31, 1986
Local Leak Rate Testing Method Improvement	V.A, B, C, D	December 31, 1986
Correction of Problem Penetrations	IV.D.1	December 31, 1987

VII. Integrated Leak Rate Test - 1987 Refueling Outage

A. Guidance given in IE Information Notice 85-71 indicates that an improved maintenance and test program for containment penetration boundaries and isolation valves could be an acceptable alternative to increasing the frequency of Type A tests.

In this regard, the aggressive actions listed above will ensure:

1. That positive steps are being taken to eliminate the excessive leakage from containment isolation valves found during the conduct of local leak rate testing.

2. During a forced outage greater than 30 days, selected penetrations, which through trending indicate the possibility of exceeding penetration leak rate acceptance criteria, will be tested.

B. Due to the current plant status of being in a forced outage greater than 30 days, we have addressed Item IV.A.1 by testing 14 penetrations identified by the trending program.

C. The Corrective Action Plan will assure that containment integrity is maintained via increased testing and trending. The resultant of the plan will ensure that in the event of an accident the dose levels do not exceed 10CFR100 limits. Therefore, this alternate improved maintenance and testing (Type B and C) plan can fulfill the requirements of increased frequency of Type A tests. An appropriate exemption request will be submitted regarding this issue.