



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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DMB

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August 15, 1986

James G Keppler, Administrator
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
CONFIRMATORY ACTION LETTER PRE-STARTUP COMMITMENT STATUS REPORT

May 19, 1986, the Palisades Plant tripped on high pressurizer pressure following a failure of the redundant Electro Hydraulic Control (EHC) system power supplies which resulted in closure of the turbine control valves. A number of equipment problems, some of which were known prior to the event, hampered the operator's response to the subsequent plant transient.

May 21, 1986, a Confirmatory Action Letter was issued which required Consumers Power Company to proceed immediately to cold shutdown and to remain shutdown until investigations were conducted of the May 19, 1986 reactor trip, and of the general status of plant safety-related and non-safety-related equipment.

May 22 through 25, 1986, an NRC Augmented Investigation Team performed a special onsite review relating to the concerns over the multiple equipment failures at the Palisades facility, as demonstrated by the May 19 reactor trip and associated equipment failures, the potential for serious challenges to safety systems such failures pose, and the burden these failures place on the operating staff in order to maintain the plant in a safe operating condition. This action resulted in an Inspection Report dated June 30, 1986 that described the findings in the areas examined during the review.

Concurrent with the NRC action, Consumers Power Company initiated a Material Condition Review Task Force to address the actions required by the Confirmatory Action Letter.

Consumers Power Company's initial results and response to the Confirmatory Action Letter was submitted July 3, 1986. In this letter, we identified 222 items that could be considered problems or potential problems. This identification resulted in 544 recommended actions of which 316 were to be completed prior to plant startup or a Justification for Continued Operation.

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Administrator, Region III
Palisades Plant
Confirmatory Action Letter
Pre-Startup Commitment Status Report
August 15, 1986

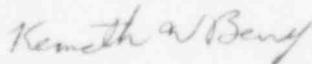
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(JCO) would be submitted. All but 10 of the identified 316 action items will be completed prior to startup. In addition to the Plant Equipment Status investigation, we committed to develop an Augmented Test Program. In accordance with our commitment made in the July 3, 1986 letter, the majority (approximately 75 percent) of the specified items in the Augmented Test Program will have been performed prior to startup with the remainder being scheduled for completion no later than the end of the next refueling outage.

The attachment to this letter describes the delayed action items by component and the corrective action planned for their completion. Also included in the attachment is any exception to the corrective action plus the resulting Justification for Continued Operation.

Discussions with NRC staff have indicated that a meeting between the NRC and Consumers Power Company, regarding our corrective action measures prior to startup, is not necessary. Consumers Power Company therefore requests approval, as specified in the May 21, 1986 Confirmatory Action Letter, to restart the Palisades Plant mid September 1986.

If there are any changes in the status of pre-startup action items, that would mean an additional item not being completed prior to startup, the required information will be transmitted as soon as it is available.



Kenneth W Berry
Director, Nuclear Licensing

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector - Palisades

Attachment

ATTACHMENT

Consumers Power Company
Palisades Plant
Docket 50-255

EXCEPTIONS TO PRE-STARTUP ACTION ITEMS

FROM

JULY 3, 1986 PLANT MATERIAL CONDITION TASK FORCE FINAL REPORT

August 15, 1986

3 Pages

EXCEPTIONS TO PRE-STARTUP ACTION ITEMS
FROM 7/3/86 PLANT
MATERIAL CONDITION TASK FORCE FINAL REPORT

OBSERVATION NO.	COMPONENTS	ACTION	EXCEPTION
CDS-07	Moisture Separator Drain Tank Drain CV-0608 and CV-0609	Put the valves on a quarterly PM to verify proper valve operation.	Stroking the valves at power would create a transient which could result in a plant trip, and therefore, they will be tested during shutdowns only. The majority of past problems with these valves are attributable to instrument air moisture, which has been resolved with installation of the new instrument air dryer.
CLP-01	Containment Sump Level Transmitters LT-0382 and LT-0383	Perform leak tests prior to and following modifications to the transmitter bypass valve handles (required to eliminate an interference problem with piping).	The bypass valve handle interference problem was resolved by using a handle of different design. Although a leak test was not required for this modifica- tion, the sensing lines have been shown to be leak tight.
CVC-07	Letdown Diversion Valve CV-2056	Stage and test a replace- ment valve as a contingency for leakage problems which may occur during startup.	Parts are available for a complete valve rebuild with the exception of a lower seat (expected to be shipped 8/8/86). A new body is not available, so a spare valve cannot be staged and tested. Will monitor leakage during start-up and if necessary repair.
CWS-02	Cooling Tower Basin Level Switches LS-5307 and LS-5308	Delete the pump trip func- tions from these switches; leave the alarm intact.	The pump trip function will be retained. Action was proposed to prevent trip due to spurious level indication. Past problems have been due to wet instrument air, which has been resolved by install- ing instrument air dryer. A follow-up evaluation will continue to determine if redundant level instrumentation should be installed to minimize the potential for a spurious trip.

EXCEPTIONS TO PRE-STARTUP ACTION ITEMS
FROM 7/3/86 PLANT
MATERIAL CONDITION TASK FORCE FINAL REPORT

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OBSERVATION NO.	COMPONENTS	ACTION	EXCEPTION
EPS-01	Emergency Diesel Generator Instrumentation	If feasible, replace frequency and load indication prior to startup.	Parts lead time is such that this is not feasible (36 weeks delivery). Installation will be performed during the 1987 maintenance outage. During the interim, portable instrumentation will be utilized to supplement installed instrumentation during testing to assure proper diesel generator operation.
ESS-05	Shutdown Cooling Heat Exchangers	900R/hr hot spot should be removed.	The hot spot intensity and location has changed (now 500 R/hr). A hydro and/or chemical flush will be necessary to eliminate the hot spot, requiring isolation of the shutdown cooling heat exchangers. This, in turn, will require an alternate shutdown cooling path which will be completed during the next refueling outage. Meanwhile, a physical barrier will be placed around the hot spot for personnel protection. The hot spot is <u>not</u> a significant contributor to general area dose rate in the West Safeguards Room.
ESS-06	Safety Injection/Refueling Water Tank Discharge Isolation Valves CV-3031 and CV-3057	Perform preventive maintenance (repacking) on the valves and check stroke times. Adjust PM frequency as deemed appropriate.	Repacking and testing of CV-3031 was performed in January, 1986 and will not be repeated prior to startup. CV-3057 will be repacked prior to start-up. Both valves will be stroke tested via Tech Spec Surveillance testing.

EXCEPTIONS TO PRE-STARTUP ACTION ITEMS
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OBSERVATION NO.	COMPONENTS	ACTION	EXCEPTION
ESS-07	SIRW Tank Recirculation Flow Indication FI-0404, FT-0404	Relocate FT-0404 upstream of the SIRW Tank fast recirculation line to prevent over-ranging.	The Facility Change package has been prepared and materials procured. PRC recommended not implementing with the SIRW Tank filled since a freeze seal would be required to prevent the tank from draining. Implementation will be postponed until the next refout when the tank has been emptied to the refueling canal. Calibration will be performed prior to startup, and Operations will insure that the instrument is valved out whenever the SIRW tank is on fast-recirculation to assure that the instrument is not over-ranged.
RIA-23	RIA-2316, Fuel Handling Area Monitor #1	Insure operability.	This monitor is required for fuel movement only and is normally disabled during plant operation. Operability will be insured prior to moving fuel in the next refueling outage.
SPS-03	DC Bus Ground Alarm	Obtain the services of an independent authority to assist with the grounding problem assessment and resolutions.	Inquiries at other utilities and vendors indicate an independent authority is not available. Plant Operations and Electrical Maintenance Departments have agreed on lines of responsibility and actions to be taken when a DC alarm is received. The plant goal is to have no DC alarms upon restart from an outage.