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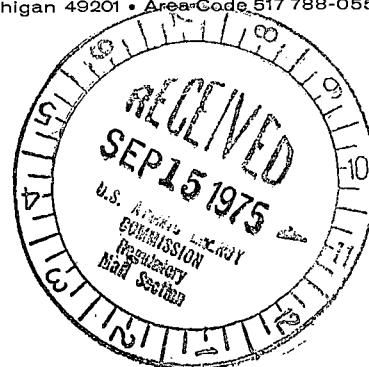
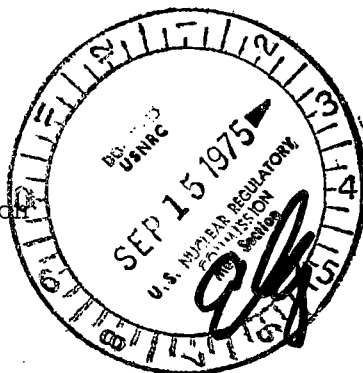
**Consumers
Power
Company**

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

September 11, 1975

Mr Karl L. Goller
Division of Reactor Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255, LICENSE
DPR-20 - PALISADES PLANT



By letter dated August 4, 1975 you noted that 10 CFR 50, Appendix J, was published February 14, 1973 and that some plants may not now be in full compliance with the requirements of this regulation as they were constructed prior to the issuance of this regulation. You requested that we determine if we are conducting containment leakage testing at the Palisades Plant in full compliance with Appendix J and if we were not in full compliance that we identify planned actions and our schedule to obtain conformance to the Regulation. You noted that possible courses of action included design modifications, amendments to the Technical Specifications, and request for exemption pursuant to 10 CFR 50.12.

We have reviewed the requirements of Appendix J and the procedures utilized in containment leakage testing. We note that on April 10, 1973 we proposed Technical Specifications changes to update the containment leak rate testing requirements so that they would be in accordance with the provisions of the then recently issued Appendix J, insofar as practical.

The results of the review are summarized in the attachment to this letter. It was noted that several minor procedural revisions are required to insure that some of the detail of Appendix J is not overlooked during leakage testing. These procedure changes will be completed within about 30 days. In addition, one exemption from Appendix J is required.

Pursuant to 10 CFR 50.12, Consumers Power Company hereby requests a specific exemption from the requirement that the personnel air lock be tested after each opening. This requirement is contained in 10 CFR 50, Appendix J, Section III.D.2.

The Palisades Plant was designed, constructed, and licensed prior to the issuance of Appendix J. During design and construction, it was anticipated that access to portions of the containment would be routinely available during operation and equipment was located and installed based on this philosophy. Thus, during

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routine operations, access to the containment via the personnel lock is required two to three times a week. During start-up access to the containment through the personnel lock is required many times per day.

In order to perform a local leak test on the personnel lock, a "strongback" or test clamps must be utilized on the inner door of the lock. The test clamp, fully installed, requires installing and torquing 48 bolts in place through the strongback clamps. The lock must then be pressurized, allowed to stabilize, tested, blown down and the strongback test clamps removed before entry can be made again. This test process takes a minimum of 12 hours to perform. Thus, we have concluded that it is not feasible to test the personnel lock after each opening.

Early in plant life, minor deficiencies were detected during local leak testing of the personnel lock. These deficiencies have been corrected. For the past several years, the results of local leak test performed on the personnel lock at six-month intervals have been satisfactory with no corrective action required. We believe that this demonstrates that there is no requirement to perform local leak testing of the personnel lock at intervals more frequent than six months and, therefore, have concluded that issuance of this specific exemption will not endanger life or property and is in the public interest.



Ralph B. Sewell
Nuclear Licensing Administrator

CC: JGKeppler
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SUMMARY OF PALISADES PLANT
Status of Conformance
to 10 CFR 50, Appendix J

III. *Leakage Testing Requirements

All preoperational tests have been completed by Bechtel as reported in their Job Number 5935 "Containment Building Integrated Leak Rate Test," of May 20, 1970.

A. Type A Test

1. Pretest Requirements

- a. The specified containment inspection is presently not specified in our procedures. This, prior to the Type A test inspection, will be included in our procedures, along with any requirements or restrictions associated with the inspection.

The requirement for identifying potential excessive leakage paths is included in our "Containment Integrated Leak Rate Test Procedure" (M-CLP-1, Rev 0), but the procedure does not specifically state that the local leak testing required when excessive leaks are found be carried out at the pressure P_t . This appropriate pressure designation will be included in our procedures.

Also, it is not, at this time, mentioned in our procedures that during the supplemental testing for leak rate accuracy potentially excessive leakage paths might be identified. This fact will be included in our procedures along with the proper reporting requirements.

- b. Presently, our procedures do not specify that the repair information on valve closure maintenance, if any, be included in the report on the test to the commission. The fact will be specified in our procedures.

- c. We are in full compliance.

- d. We are in full compliance.

2. Conduct of Tests

We are in full compliance.

3. Test Methods

- a. We are in full compliance.

*Outline corresponds to 10 CFR 50, Appendix J.

b. We are in full compliance.

c. We are in full compliance.

4. Preoperational Leakage Rate Tests

All preoperational testing has been completed.

5. Periodic Leakage Rate Tests

a. Test Pressure

(1) We are in compliance.

(2) Not applicable.

b. Acceptance Criteria

(1) The Palisades Technical Specifications limit the leakage rate L_{tm} to less than $0.75 L_t$.

Our procedures will be modified to specify that local leakage testing shall be taken at a test pressure P_t .

(2) Not applicable.

6. Additional Requirements

a. We are in full compliance.

b. Not applicable.

B. Type B Tests

1. Test Methods

a. Not applicable.

b. Our procedures use this type of test.

c. Not applicable.

2. Test Pressure

We are in full compliance.

3. Acceptance Criteria

We are in full compliance.

C. Type C Tests

1. Test Method

We are in full compliance.

2. Test Pressure

We are in full compliance.

3. Acceptance Criterion

We are in compliance.

D. Periodic Retest Schedule

1. a. We are in compliance.

b. We are in compliance.

2. Type B Tests

We cannot test our air locks after each opening because of frequent access requirements and the physical technique required to run the test.

We will test our air locks every six months.

3. Type C Tests

We are in compliance.

IV. Special Testing Requirements

A. Containment Modification

We will include this inspection in our procedures.

B. Multiple Leakage Barrier or Subatmospheric Containments

We are in full compliance.

V. Inspection and Reporting of Tests

A. Containment Inspection

We will include this inspection in our procedures.

B. Report of Test Results

1. We will include an appendix to our procedures describing all necessary reporting requirements.

2. All preoperational tests have been completed.

3. See 1 above.