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November 5, 1976

Director of Nuclear Reactor Regulation  
Att: Mr Albert Schwencer, Chief  
Operating Reactor Branch No 1  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET 50-255 LICENSE DPR-20 -  
PALISADES PLANT - REACTOR VESSEL  
OVERPRESSURIZATION

In our letter dated October 7, 1976, responding to your concern regarding instances of reactor vessel overpressurization, we indicated that we expected to be able to submit short-term solutions for our Palisades Plant about November 1, 1976. This letter presents the short-term measures that have been implemented to minimize potential reactor vessel overpressurizations.

1. The operating procedures have been changed to require that at least one primary coolant pump (PCP) be in operation during plant cooldown until equilibrium ( $T_{hot}$  and  $T_{cold}$  are essentially equal and steam generator secondary pressure is essentially at atmospheric pressure) exists between the steam generators and the remainder of the primary coolant system.

This type of cooldown has been the general operating practice at our Palisades Plant. Formalizing it as a procedural requirement will insure that inadvertent PCP starts cannot lead to overpressurization problems caused by a hot steam generator.

2. The operating procedures have been changed to require that the high-pressure safety injection pumps (HPSI) be disabled and returned to service at the same time as the safety injection tanks.

This change in procedure will significantly reduce the probability of an inadvertent HPSI pump start during the time when the primary system is in the water solid condition.

3. The shutdown cooling system (SCS) was reviewed. This review showed that the pressure interlock for this system is a permissive type interlock (does not cause automatic valve operation). This arrangement will insure that during the time when the SCS is in service the primary system pressure would be limited to about 310 psi, the relief point of the system relief valve. This relief valve has sufficient capacity (142 gpm) to handle the transient that could occur through the inadvertent closure of the letdown control valve.

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We conclude that the above changes will significantly reduce the potential for a reactor vessel overpressurization. We are continuing to study this problem with other CE owners and will pursue long-term solutions expeditiously.

David A Bixel (Signed)

David A Bixel  
Assistant Nuclear Licensing Administrator

CC: JGKeppler, USNRC