

ATTACHMENT 1

Consumers Power Company
Palisades Plant
Docket 50-255

SUMMARY OF CHANGES TO PLANT PROCEDURE EM-09-02

"INSERVICE TESTING OF PLANT VALVES"

June 28, 1991

ATTACHMENT 1

INSERVICE TESTING OF PLANT VALVES REVISION SUMMARY

Relief request number 7 for CV-ES3239 and CK-ES3240 is revised to reflect the use of disassembly and inspection per EM-28-02, "Preventive Maintenance Program for Check Valves." Due to piping configuration and the fact containment sump water is not suitable for normal ESS pump testing and check valve exercise testing, these valves will be periodically disassembled and inspected as allowed by Generic Letter 89-04.

Relief request number 8 is revised to remove HPSI pump inlet check valves CK-3188 and CK-3168, because they are full stroke exercised in accordance with Technical Specification 4.0.5 and ASME Section XI. Due to the fact check valves CK-3177, CK-3186 and CK-ES3411 cannot be full stroke tested under any plant conditions other than cold shutdown with the vessel head removed, these valves will be periodically disassembled and inspected per EM-28-02 as allowed by Generic Letter 89-04.

Relief request number 26 is new. CK-ES2112 and CK-ES2114 are not full stroke tested during any plant condition. Therefore, these valves will be periodically disassembled and inspected per EM-28-02 as allowed by Generic Letter 89-04.

Relief request number 27 is new. With the present plant configuration it is not possible to confirm the full stroke capability to the open and closed positions for the service water pump discharge valves. Therefore, these valves will be periodically disassembled and inspected per EM-28-02 as allowed by Generic Letter 89-04.

Cold shutdown test basis number 13 is revised to show CV-3031 and CV-3057 as category B for which leak testing per surveillance procedure RT-88A is not required. RT-88A has been canceled as part of the corrective action for Event Report E-PAL-90-035.

Relief request number 24 is new for CK-CD407. This valve was recently added via facility change FC-892-1. Present configuration does not allow verification of opening or closing capability. Therefore, these valves will be periodically disassembled and inspected per EM-28-02 as allowed by Generic Letter 89-04.

Relief request number 25 is new for CV-0727, CV-0736A, CV-0737A and CV-0749. The subject valves are required to regulate auxiliary feedwater flow to the steam generators. They are not required to go to the full open or closed position for plant safety. Because of this, stroke time testing is not an appropriate indicator of valve regulating performance. In lieu of the stroke time testing, the flow regulating capability of the valves will be verified quarterly.