



Consumers
Power
Company

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 786-0550

December 6, 1973

Mr. J. G. Keppler
Directorate of Regulatory Operations
Region III
US Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Docket 50-255
License DPR-20
Palisades Plant

Dear Mr. Keppler:

Your letter of November 12, 1973 requested a statement of explanation be submitted with respect to one item of apparent non-compliance at the Palisades Plant; namely, that we did not sample and analyze all liquid waste released from the turbine building sump to the circulating water discharge during the period August 8 to August 17, 1973. Your letter further identified a safety item in that secondary coolant was released from the turbine building sump to Lake Michigan via an unmonitored pathway. This letter will apprise you of the action being taken to correct these discrepancies.

As stated in your letter, we did release potentially contaminated secondary coolant from the turbine building sump between August 8 and August 17, 1973 without prior sampling and analysis. This occurred because we assumed that no detectable activity would be present in the turbine building sump (even though a steam generator tube leak existed) at times other than when draining the condenser hot well directly to the turbine building sump. This was not the case, as was demonstrated by the sampling and analysis program started on August 17 at the request of your personnel.

The activity that was discharged unmonitored from the sump was less than that discharged due to draining the hot well because it was composed of leakage from the secondary system diluted by leakage of noncontaminated water from other plant systems. The discharges of water directly from the hot well (secondary system water essentially undiluted) resulted in releases that were only several percent of technical specification limits. As diluted secondary system discharges would be less than hot well releases, we have concluded that no concentration limits were exceeded.

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The turbine building sump is being modified to allow collection and treatment of liquids collected in the sump as radiation monitor is being installed in the turbine building sump discharge piping. This will aid in determining when the liquids are potentially contaminated. If there is any indication of a potentially contaminated liquid, it will be sampled and analyzed.

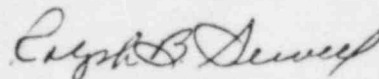
The radiation monitor will be installed prior to returning the plant to service. The other modifications are expected to be completed prior to returning the plant to service. Until the modifications described above are completed, the turbine building sump will be operated on a batch basis instead of the automatic pumping mode.

Because of this incident and other discussions with your personnel, we are reviewing all potential release paths for radioactive materials and past practices with regard to monitoring and accounting for radioactive materials releases. This review is being conducted by a Company health physicist that is not directly associated with the plant staff or our Nuclear Operations Department. We will be happy to discuss the results of this review with you after it is completed, which should be within two weeks. If any violations of Technical Specifications are discovered, we will inform your staff immediately. The purpose of this review is to ensure that in the future our operations with regard to radioactive materials releases, monitoring and accounting are conducted in full accordance with our license and good engineering practice.

With regard to the item identified as a safety item, the modifications discussed above also include provisions to reroute the turbine building sump discharge such that it discharges upstream of the discharge structure monitor. In addition and as discussed above, a continuous monitor is being installed in the turbine building sump discharge piping. These modifications will preclude further unmonitored discharges from the turbine building sump.

Your letter further requested that, with regard to the gaseous I-131 release that occurred between August 11 and August 15, 1973, we reevaluate our methods of determining the gaseous release rate and provide you the results of the calculations. In addition, you requested that we amend the data in our August 24, 1973 submittal to include results of direct environmental measurements. Re-evaluation of our methods is in progress and we will transmit the results of our calculations and amend the August 24, 1973 letter during the week of December 10, 1973.

Yours very truly,



Ralph B. Sewell
Nuclear Licensing Administrator

RBS/ds