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Consumers
Power
Company

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

March 27, 1975

Division of Reactor Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket 50-255
License DPR-20
Palisades Plant
AO-4-75

Gentlemen:

On March 17, 1975 Consumers Power Company submitted AO-4-75 concerning seismic restraints on piping systems at the Palisades Plant. Since submittal of that report, the review of safety-related and shut-down cooling systems has been completed. The installation and/or modification of restraints will be completed this evening (March 27, 1975). This letter is written to update the March 17, 1975 report to reflect action taken during the past ten days.

Item 8, "Analysis of Occurrence," is revised to read as follows:

"8. Analysis of Occurrence: It has been determined that 102 new restraints, 12 restraint replacements and 74 restraint modifications were required or added for additional conservatism. Of the 188 total, 66 were on lines 2-1/2" and larger, and 122 on lines 2" and smaller.

The systems (complete or portions of) studied are as follows:

- a. High- and low-pressure safety injection systems both inside and outside containment.
- b. Critical service water system both inside and outside containment through isolable branch connections.
- c. Component cooling water outside containment.
- d. Charging system.
- e. Concentrated boric acid system.
- f. Air room purge and containment air purge outside containment.
- g. Containment spray.
- h. CVCS letdown system through flow control valves.
- i. Fuel oil to the emergency diesels.

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- "j. Connections to the primary loop through the isolation valves.
- k. Auxiliary feed-water system.
- l. Gas decay tank connections.
- m. Diesel generator auxiliary systems.
- n. High-pressure air to the safeguard valves.

"Based on the review performed, it is our judgment that operation without these restraints would not have resulted in a loss of functional integrity of the shutdown cooling system or ESS systems during a seismic occurrence."

Item 9, "Corrective Action," is revised to read as follows:

"9. Corrective Action: Each of the safety-related and shutdown cooling systems (see Item 8) have been reviewed. New restraints and modifications to existing restraints identified will be installed prior to resuming reactor critical operations.

"The Plant Review Committee has reviewed the work effort involved in correcting this abnormal occurrence including the logic of selection of systems for detailed review. Based on this review, they concluded that the systems required for shutdown of the plant will operate as designed."

Yours very truly,

Ralph B. Sewell (Signed)

RBS/mel

CC: JGKepler, USNRC

Ralph B. Sewell
Nuclear Licensing Administrator