



Consumers  
Power  
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

October 5, 1984

Director,  
Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - RESPONSE TO NUREG-0737 ITEM II.K.3.25, REACTOR COOLANT PUMP  
SEAL INTEGRITY FOLLOWING LOSS OF OFFSITE POWER

NRC letter dated August 29, 1984 and entitled "NUREG-0737 Item II.K.3.25, Reactor Coolant Pump Seal Integrity Following Loss of Offsite Power," indicated that the Palisades Plant was among the eight (8) PWRs that had not limited the potential for reactor coolant pump seal failure by automatically loading the seal coolant injection pumps onto the emergency power bus. We were requested to demonstrate that the Palisades reactor coolant pump seal cooling system design satisfies General Design Criteria 44 and to show why automatic initiation of seal cooling upon loss of offsite power should not be required.

Consumers Power Company has reviewed the Safety Evaluation attached to the August 29, 1984 NRC letter and has determined that to satisfy the concerns of the NRC related to NUREG-0737 Item II.K.3.25 it would be appropriate to have automatic starting of the component cooling pump for a loss of offsite power at Palisades.

Consumers Power Company therefore commits to make the modification to add the component cooling water pumps to the shutdown sequencer pending resolution of the pump seal and station blackout unresolved safety issues. We anticipate that resolution of this concern will occur prior to our next refueling outage (completion of cycle 6). Consumers Power Company believes that the following reasons for justification for continued operation are adequate to insure the safety of plant until the modification to add the component cooling water pumps to the shutdown sequencer is completed.

1. Palisades does not use seal injection but rather a controlled bleed off flow through the seals. It is felt that this design is less susceptible to seal failure for a loss of component cooling water.

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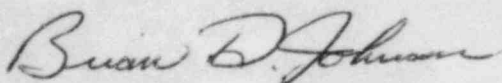
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Director, NRR  
Palisades Plant  
RESPONSE TO NUREG-0737  
ITEM II.K.3.25  
October 5, 1984

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2. Starting the component cooling water pumps is one of the first operator actions according to the Loss of Offsite Power Emergency Procedure. It is felt this is an acceptable interim measure to assure component cooling water is returned to the reactor coolant pumps promptly.
3. Temperature alarms for the lower seal and the controlled bleed off give the operators warning of lack of component cooling water to the RCP seals. This would remind the operators to start the component cooling water pumps if they had not already done so.
4. Amendment 14 to the Palisades Plant FSAR states the reactor coolant pumps can run for ten minutes without component cooling water before taking any pump protective action. Upon a loss of offsite power, the reactor coolant pumps would stop running, therefore, the acceptable time the operators have to restart the component cooling water pumps should be greater than ten minutes. This time is more than adequate to perform this routine operator action.

In conclusion, Consumers Power Company commits to adding the component cooling water pumps to the shutdown sequencer. This will assure that the component cooling water pumps will start automatically upon a loss of off-site power. The modification is planned for the next refueling outage at Palisades which is presently scheduled for early 1986. Until that modification is made, we feel the justification for continued operation given in this submittal is adequate to insure the safety of the plant.



Brian D Johnson  
Staff Licensing Engineer

CC Administrator, Region III, USNRC  
NRC Resident Inspector - Palisades

CONSUMERS POWER COMPANY  
Palisades Plant  
Docket 50-255 - License DPR-20

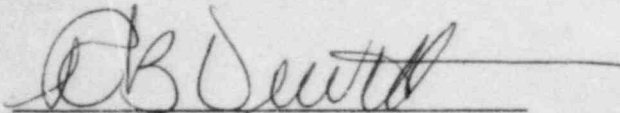
REPONSE TO NUREG-0737 ITEM II.K.3.25

"REACTOR COOLANT PUMP SEAL INTEGRITY  
FOLLOWING LOSS OF OFFSITE POWER"

At the request of the Commission and pursuant to the Atomic Energy Act of 1954 and the Energy Reorganization Act of 1974, as amended, and the Commission's Rule and Regulations thereunder, Consumers Power Company submits our response to NRC letter dated August 29, 1984 entitled "NUREG-0737 Item II.K.3.25, Reactor Coolant Pump Seal Integrity Following Loss of Offsite Power". Our response is dated October 5, 1984.

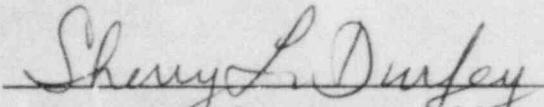
CONSUMERS POWER COMPANY

By



R B DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 5th day of October 1984.



Sherry L. Durfey, Notary Public  
Jackson County, Michigan

My commission expires November 5, 1986.

**SHERRY LYNN DURFEY**  
Notary Public, Jackson County, Mich.  
My Commission Expires Nov. 5, 1986