



Palisades Nuclear Plant 27780 Blue Star Memorial Highway, Covert, MI 49043

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Nuclear Regulatory Commission  
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - CORRECTION FACTOR FOR  
IRRADIATION TEMPERATURE BELOW 525°F - PRESSURIZED THERMAL SHOCK -  
10CFR50.61 - REVISION 1

Consumers Power Company's March 11, 1992 letter addressed the propriety of not using an irradiation temperature correction factor when applying Regulatory Guide (RG) 1.99, Revision 2, approved methodology to determine  $RT_{PTS}$  for the Palisades reactor vessel beltline material. Although, early in life, that beltline material was irradiated at temperatures below the RG 1.99, Revision 2, applicable temperature range (525°F - 575°F), four reasons for not applying an irradiation temperature correction factor were provided.

This revision to our March 11, 1992 letter provides supplemental information which: (1) includes the girth weld when computing a weighted average irradiation temperature (Reason 2 below); (2) explains why we estimated 534°F as T-Cold from the present to the time when the screening criterion limit will be exceeded; and (3) identifies the data plotted in Figure 1. Additionally, this revision corrects minor errors in the original letter including the number of CE and Westinghouse plants used in RG 1.99, Revision 2, Reference 2 (should be 42 rather than 44) and the reactor vessel plate fluence value and resulting computed chemistry factor stated in Reason 4 below. Vertical lines in the right margin indicate where changes are made to include the supplemental information and corrections.

Section C.1.3 of Regulatory Guide (RG) 1.99, Revision 2, states that calculation procedures utilizing the equations in the Guide are valid for a nominal irradiation temperature of 550°F; and, that irradiation below 525°F should be considered to produce greater embrittlement and a correction factor justified by reference to actual data should be used.

A preliminary search of Palisades records indicated that, during Cycle 1 and the first half of Cycle 2, the plant operated with a T-average program which

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