

February 14, 2000

Mr. Daniel G. Malone
Acting Director, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - ADDITIONAL CORRECTION TO SAFETY EVALUATION
FOR RELIEF REQUEST 11 OF THE THIRD INSERVICE INSPECTION
PROGRAM (TAC NO. M93628)

Dear Mr. Malone:

By letter dated October 14, 1998, the NRC staff forwarded a corrected safety evaluation and an accompanying Technical Evaluation Report (TER) by Idaho National Engineering Laboratory (INEL) regarding Request for Relief No. 11 (RR-11) related to the Palisades Plant Third 120-Month Interval Inservice Inspection (ISI) Program Plan. On page 3 of the corrected safety evaluation, the NRC staff concluded with respect to RR-11 that:

The licensee's proposed alternative to perform manual examinations from the inside surface of the reactor vessel (RPV) lower head meridional welds provides reasonable assurance of operational readiness of the RPV lower head meridional welds.

By letter dated December 19, 1998, you identified an additional error in the above statement inasmuch as it refers to a "manual" examination. As described in your letter of February 19, 1996, and in INEL's TER forwarded by our letter of October 14, 1998, the examination from the inside surface is to be performed ultrasonically using remotely operated mechanized equipment. The NRC staff agrees that the reference to a "manual" examination is an error as it is inconsistent with your proposed alternative, INEL's TER, and the NRC staff's intended statement.

Accordingly, please substitute the enclosed page 3 for the corresponding page of our safety evaluation dated October 14, 1998. In the new page, the above statement is changed to read:

The licensee's proposed alternative to perform ultrasonic examinations using remotely operated mechanized equipment from the inside surface of the reactor vessel (RPV) lower head meridional welds provides reasonable assurance of operational readiness of the RPV lower head meridional welds.

D. Malone

- 2 -

We regret any inconvenience this error may have caused. If you have questions regarding this correction, please contact me at (301) 415-3049 or by e-mail at dsh@nrc.gov.

Sincerely,

/RA/

Darl S. Hood, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: Replacement page 3 of safety evaluation
dated October 14, 1998

cc w/encl: See next page

D. Malone

- 2 -

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Sincerely,

/RA/

Darl S. Hood, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
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Docket No. 50-255

Enclosure: Replacement page 3 of safety evaluation
dated October 14, 1998

cc w/encl: See next page

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Palisades Plant

cc:

Mr. Thomas J. Palmisano
Site Vice President
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

Mr. Robert A. Fenech, Senior Vice President
Nuclear, Fossil, and Hydro Operations
Consumers Energy Company
212 West Michigan Avenue
Jackson, MI 49201

Arunas T. Udry, Esquire
Consumers Energy Company
212 West Michigan Avenue
Jackson, MI 49201

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Jerry Sarno, Supervisor
Covert Township
P. O. Box 35
Covert, MI 49043

Office of the Governor
P. O. Box 30013
Lansing, MI 48909

U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Palisades Plant
27782 Blue Star Memorial Highway
Covert, MI 49043

Drinking Water and Radiological
Protection Division
Michigan Department of
Environmental Quality
3423 N. Martin Luther King Jr Blvd
P. O. Box 30630 CPH Mailroom
Lansing, MI 48909-8130

Michigan Department of Attorney General
Special Litigation Division
630 Law Building
P.O. Box 30212
Lansing, MI 48909

November 1999

Compliance with the Code requirement contained in Request for Relief RR-11 would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee's proposed alternative to perform ultrasonic examinations using remotely operated mechanized equipment from the inside surface of the reactor vessel (RPV) lower head meridional welds provides reasonable assurance of operational readiness of the RPV lower head meridional welds. Therefore, the licensee's proposed alternative is authorized pursuant to 10 CFR 55a(a)(3)(ii) as required.

Request for Relief No RR-04 is denied because the basis for relief from the Code requirements was based on estimated coverages, not on actual coverages. The licensee may consider resubmitting its request for relief when the actual coverage is obtained. Request for Relief No. RR-09 was withdrawn by the licensee in its letter dated June 24, 1996.³

Attachment: INEL Technical Evaluation Report

Principal Contributor: T. McLellan

Date: January 9, 1997

Corrected: October 14, 1998

Corrected: February 14, 2000

³By letter dated June 3, 1997, the licensee resubmitted Requests for Relief RR-4 and RR-9. The staff evaluation of the resubmitted relief requests was provided in a safety evaluation dated March 20, 1998.