



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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

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General Manager

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Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES
ADDITIONAL INFORMATION - FULL TERM OPERATING LICENSE

During a telephone call between the NRC Project Manager and Consumers Power Company staff, the NRC requested additional information to assist the NRC staff in developing the Safety Evaluation Report (SER) for the Full Term Operating License for the Palisades Plant. The additional information requested was as follows:

1. The date of the SER providing the provisional operating license to the Palisades Plant.
2. A summary of exemptions from 10CFR that are still valid.
3. A verification that all TMI (NUREG-0737) items are complete.
4. A list of license conditions that are still applicable.
5. Submittal dates of letters between Consumers Power Company and the NRC regarding the Palisades spent fuel pool re-racking project.

The following material supplies the requested information. Also, where noted, copies of the relevant docketed correspondence between the NRC and CPCo are attached.

1. The SER providing the initial Interim Provisional Operating License for the Palisades Plant was issued by the Atomic Energy Commission on March 24, 1971. This license permitted initial fuel loading and low power

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testing of the Palisades Plant. A copy of that letter is enclosed as Attachment A.

2. Our review has identified one exemption from 10CFR50 Appendix J, four approved exemptions from the requirements of 10CFR50 Appendix R, and one schedular exemption request to Appendix R that is still pending NRC approval.

This review does not include exemptions that were granted as part of a Technical Specification change request, nor does it list one time or schedular exemptions that have been closed.

A. Exemption from 10CFR50 Appendix J - SER dated December 6, 1989 -
This exemption provides partial relief from the requirement to test the containment airlocks at or above the calculated design basis accident peak containment pressure and permits the substitution of a between-the-seals leak test at a reduced pressure.

B. Exemptions from 10CFR50 Appendix R -

1. Section III.G.3 - Engineered Safeguards Panel Room.
Exemption to requirement for fire detection and fixed fire suppression.
Original CPCo submittal dated July 25, 1983
Revised July 16, 1984
Approved by NRC SER dated July 12, 1985
2. Section III.G.3 - Corridor between Charging Pump Room and Switchgear Room 1C -
Exemption to requirement for fire detection and fixed fire suppression.
Original CPCo submittal July 25, 1983
Revised July 16, 1984
Approved by NRC SER dated July 12, 1985
3. Section III.G.3 - Control Room -
Exemption to requirement for fire detection and fixed fire suppression.
Original CPCo submittal July 1, 1982
Approved by NRC SER dated February 8, 1983
4. Section III.G.2 - Cable Separation Inside Containment -
Exemption to the requirement concerning intervening combustibles installed between redundant instrumentation cable trays.
Original CPCo submittal July 20, 1984
Additional information submitted December 28, 1984
Approved by NRC SER dated July 23, 1985

5. Original CPGO submittal March 13, 1990
Section III.G.2 - Cable Separation In Containment Air Room
Additional information submitted August 8, 1990 (pending NRC approval)

The relevant documents are contained in Attachment B to this letter.

3. By a letter dated April 14, 1989, the NRC requested Consumers Power Company to review the status of all TMI (NUREG-0737) items. Consumers Power Company replied by letter dated April 18, 1989 that all TMI action plan items for the Palisades Plant were closed with the exception of item II.D.1.3, "Block Valve Testing" and item multi-plant action number MPA-B083, "Technical Specifications Covered by Generic Letters 83-26 & 83-37". Item II.D.1.3 has been closed by Consumers Power Company during the Fall 1989 maintenance outage by the installation of new PORV block valves. Item MPA-B083 is covered in Consumers Power Company's Restructured Technical Specification program. The Restructured Technical Specifications are currently expected to be submitted in early 1991 pending completion of NRC review of the Restructured Standard Technical Specifications.

The relevant documents are contained in Attachment C to this letter.

4. The current Palisades Provisional Operating License contains seven Orders from the Commission that modify or establish conditions to the license. It is Consumers Power Company's opinion that the requirements contained in these Orders have been completed and that all of these Orders should be removed from the Full Term Operating License.

The date of each of the Orders, their subject, and the dates of the documents that confirm the completion of the requirements contained in the Order are listed below.

- A. Order dated August 29, 1980 (Revised September 19, 1980)
Subject: Qualification of Electrical Equipment (EEQ). This Order required that "...Information which fully and completely responds to the staff's request as specified in NRC's letters dated March 6, 1980, and March 28, 1980, shall be submitted to the Director, Division of Licensing by the Licensee not later than November 1, 1980.

Closure Documents:

Draft Technical Evaluation Report dated June 19, 1980
SER dated February 10, 1981
Technical Evaluation Report dated June 1, 1981
SER dated April 25, 1983
Final SER dated January 31, 1985

- B. Order dated October 24, 1980
Subject: Qualification of Electrical Equipment. This Order required that a central file location be established for the maintenance of all equipment qualification records.

Closure Documents:
See Item A in this section.

- C. Order Dated March 25, 1983
Subject: Licensee Actions to Upgrade Facility Performance, Partial Rescission of March 9, 1981 Order. This order removed all requirements arising from the March 9, 1981 Order with the exception of the limitations imposed on operator work hours.

Closure Document:
Amendment No. 108 to POL No. DPR-20 dated October 21, 1987.

- D. Order dated April 20, 1981
Subject: Implement Technical Specifications which require periodic surveillance over the life of the plant and which specify limiting conditions of operation for PCS pressure isolation valves.

Closure Document:
Palisades Technical Specifications pages 3-30 and 4-17

- E. Order Dated March 14, 1983
Subject: NUREG-0737 Requirements (Generic Letter 82-10). This Order required that Consumers Power Company implement and maintain the items described in the attachment to the Order in the manner described in previous submittals

Closure Document:
See Item 3 above

- F. Order Dated June 12, 1984
Subject: Confirming Commitments on Emergency Response Capability (Generic Letter 82-33). This Order revised the dates by which specific items from NUREG-0737 were to be completed by Consumers Power Company.

Closure Document:
See Item 3 above

- G. Order Dated July 1, 1985
Subject: Modifying License to Confirm Additional Commitments on Emergency Response Capability (Supplement 1 to NUREG-0737). This Order provided completion schedules for: 1) Safety Parameter Display System, 2) Detailed Control Room Design Review, and 3) Upgrade Emergency Operating Procedures.

Closure Document:
See Item 3 above

5. The NRC requested the submittal dates of all letters regarding the re-racking of the Palisades Spent Fuel Pool. Those dates and the titles of the submittals are listed below. Copies of these documents are contained in Attachment D to this letter.

1. February 20, 1986 - Technical Specification Change Request - Expansion of the Spent Fuel Pool Storage Capacity
2. April 16, 1986 - Expansion of the Spent Fuel Pool Storage Capacity - Supplemental Information
3. April 24, 1986 - Expansion of the Spent Fuel Pool Storage Capacity - Supplemental Information
4. April 25, 1986 - Expansion of the Spent Fuel Storage Capacity at Palisades Plant (Request for Additional Information)
5. July 24, 1986 - Expansion of the Spent Fuel Pool Storage Capacity - Response to Request for Additional Information
6. December 19, 1986 - Expansion of Spent Fuel Pool Storage Capacity - Technical Specification Change Request - Additional Information
7. October 16, 1986 - Expansion of Spent Fuel Pool Storage Capacity - Technical Specification Change Request - Revision 1
8. April 23, 1987 - Expansion of the Spent Fuel Pool Storage Capacity - Technical Specifications Change Request - Supplemental Information
9. July 24, 1987 - Amendment No. 105. Authorized CPCo to increase the storage capacity of the spent fuel pool from 798 to 892 fuel assemblies



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