

March 17, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
TECHNICAL SPECIFICATIONS CHANGE REQUEST
Pa - IMPROVED TECHNICAL SPECIFICATIONS PAGES**

On October 29, 1999, Consumers Energy Company requested a change to the Palisades Technical Specifications (TS), which 1) revised the peak calculated containment internal pressure, P_a , listed in Section 6.5.14, Containment Leak Rate Testing Program, and 2) revised the list of methodology documents in Section 6.6.5, Core Operating Limits Report. Those changes were approved on November 15, 1999, and the revised pages for the current TS were issued as Amendment 188 to the Palisades Facility Operating License.

On January 7, 2000, Consumers Energy Company submitted corresponding changes for the Palisades Improved Technical Specifications (ITS), as discussed in the October 29, 1999 TS change request. The revised ITS pages submitted in our January 7, 2000 letter were issued by the NRC on February 10, 2000. Review of those revised ITS pages disclosed that the page which specifies P_a was inadvertently omitted from our January 7, 2000 letter. The enclosure to this letter provides the revised ITS page specifying P_a . We regret any inconvenience that this omission may have caused.

We request that the NRC re-issue the affected ITS page.

SUMMARY OF COMMITMENTS

This letter establishes no new commitments. It completes the commitment, made in our October 29, 1999 letter, to submit corresponding changes for the Palisades ITS.


Daniel G. Malone
Acting Director, Licensing

CC: Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades
Lou Brandon, Michigan Department of Environmental Quality

AD17

CONSUMERS ENERGY COMPANY

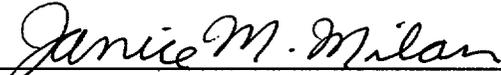
TECHNICAL SPECIFICATIONS CHANGE REQUEST

To the best of my knowledge, the content of this letter providing the Improved Technical Specifications page which incorporates the Pa change approved in Amendment 188, is truthful and complete.

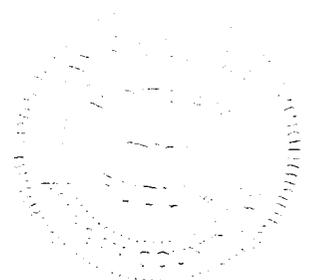


Daniel G. Malone
Acting Director, Licensing

Sworn and subscribed to before me this 17th day of March, 2000



Janice M. Milan, Notary Public
Allegan County, Michigan
(Acting in Van Buren County, Michigan)
My commission expires September 6, 2003



ENCLOSURE

**CONSUMERS ENERGY COMPANY
PALISADES PLANT
DOCKET 50-255**

**IMPROVED TECHNICAL SPECIFICATIONS PAGE
REVISED ITS PAGE SPECIFYING Pa**

5.5 Programs and Manuals

5.5.13 Safety Functions Determination Program (SFDP) (continued)

- c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.14 Containment Leak Rate Testing Program

Programs shall be established to implement the leak rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. The Type A test program shall meet the requirements of 10 CFR 50, Appendix J, Option B and shall be in accordance with the guidelines of Regulatory Guide 1.163, "Performance-Based Containment Leakage-Test Program, dated September 1995."

The Type B and Type C test program shall meet the requirements of 10 CFR 50, Appendix J, Option A, as modified by the exemption from certain requirements of 10 CFR 50 Appendix J which was granted in an NRC letter to Consumers Power Company dated December 6, 1989.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 53 psig.

The maximum allowable containment leak rate, L_a , at P_a , shall be 0.1% of containment air weight per day.

Local leak rate tests, other than Personnel Airlock doors between the seals tests, shall be performed at ≥ 55 psig.

Local leak rate tests for checking airlock doors seals within 72 hours of each door opening shall be performed as follows:

- a. A between the seals test shall be performed on the Personnel Airlock at ≥ 10 psig.
- b. A full pressure test shall be performed on the Emergency Escape Airlock at ≥ 55 psig. A seal contact check shall be performed on the Emergency Escape Airlock following each full pressure test. Emergency Escape Airlock door opening, solely for the purpose of strongback removal and performance of the seal contact check, does not necessitate additional pressure testing.