

January 12, 2001

U S Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT  
TECHNICAL SPECIFICATION CHANGE REQUEST  
CONVERSION TO OPTION B CONTAINMENT LEAK RATE TESTING  
REVISED PAGE 5.0-22 INCORPORATING NRC STAFF COMMENTS**

On December 7, 2000, Consumers Energy proposed Technical Specifications (TS) changes that would allow use of 10 CFR 50, Appendix J, Option B for Types B and C containment leak rate testing. NRC review of this change request identified an error on page 5.0-22, wherein an item was included which should not have been. The enclosure to this letter provides a corrected TS page 5.0-22 to resolve the Staff's comment and provide consistency with Technical Specification Task Force traveler TSTF-52, Revision 3.

It is our understanding that resolution of this comment will facilitate NRC approval of the requested amendment in time to support the upcoming Palisades refueling outage, presently scheduled to start March 30, 2001. We also request 60 days after approval for implementation.

A copy of this letter has been sent to the appropriate official of the State of Michigan.

**SUMMARY OF COMMITMENTS**

This letter establishes no new commitments and makes no revisions to existing commitments.

Nathan L. Haskell  
Director, Licensing and Performance AssessmentCC: Administrator, Region III, USNRC  
Project Manager, NRR, USNRC  
NRC Resident Inspector - Palisades  
Lou Brandon, Michigan Department of Environmental Quality

Enclosure

A017

**CONSUMERS ENERGY COMPANY**

**TECHNICAL SPECIFICATION CHANGE REQUEST  
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To the best of my knowledge, the content of this letter, which provides a corrected TS page 5.0-22 for the December 7, 2000 Palisades Technical Specifications change request to reflect use of 10 CFR 50, Appendix J, Option B requirements for containment leak rate testing, is truthful and complete.



Nathan L. Haskell  
Director, Licensing and Performance Assessment

Sworn and subscribed to before me this 12<sup>th</sup> day of January 2001



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

**ENCLOSURE 1**

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

**January 12, 2001**

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**2 Pages**

5.5 Programs and Manuals

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5.5.14 Containment Leak Rate Testing Program (continued)

- d. Leakage rate acceptance criteria are:
1. Containment leakage rate acceptance criteria is  $\leq 1.0 L_a$ . During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are  $< 0.60 L_a$  for the Type B and Type C tests and  $\leq 0.75 L_a$  for Type A tests.
  2. Air lock testing acceptance criteria are:
    - a) Overall air lock leakage is  $\leq 1.0 L_a$  when tested at  $\geq P_a$  and combined with all penetrations and valves subjected to Type B and C tests. However, during the first unit startup following testing performed in accordance with this program, the leakage rate acceptance criteria is  $< 0.6 L_a$  when combined with all penetrations and valves subjected to Type B and C tests.
    - b) For each Personnel Air Lock door, leakage is  $\leq 0.023 L_a$  when pressurized to  $\geq 10$  psig.
    - c) For each Emergency Escape Air Lock door, a seal contact check, consisting of a verification of continuous contact between the seals and the sealing surfaces, is acceptable.
- e. "Containment OPERABILITY" is equivalent to "Containment Integrity" for the purposes of the testing requirements.
- f. The provisions of SR 3.0.3 are applicable to the Containment Leak Rate Testing Program requirements.
- g. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.