UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 3, 2001

Mr. Nathan L. Haskell, Director
Licensing and Performance Assessment
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: STRUCTURE OF THE LIMITING CONDITIONS FOR OPERATION OF THE AUXILIARY FEEDWATER SYSTEM, SIMILAR TO THE CHANGES MADE IN TECHNICAL SPECIFICATIONS TASK FORCE CHANGE NO. 325, REVISION 0, "ECCS CONDITIONS AND REQUIRED ACTIONS WITH < 100% EQUIVALENT ECCS FLOW" (TAC NO. MB0872)

Dear Mr. Haskell:

The Commission has issued the enclosed Amendment No. 200 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TSs) in response to a portion of your application dated December 7, 2000.

The amendment changes TS 3.7.5 regarding the Limiting Conditions for Operation for the auxiliary feedwater system to be similar to changes to the "Standard Technical Specifications, Combustion Engineering Plants," NUREG 1432, Revision 1, made by the Nuclear Energy Institute Technical Specifications Task Force Change Number 325, Revision 0.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Darl S. Hood

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

Enclosures: 1. Amendment No. 200 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

NRR-058

May 3, 2001

Mr. Nathan L. Haskell, Director
Licensing and Performance Assessment
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

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/RA/

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Docket No. 50-255

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cc w/encls: See next page

DISTRIBUTION

PUBLIC	OGC	SMiranda
PDIII-1 Reading	ACRS	CHarbuck
CCraig	WBeckner	
DHood	GHill(2)	
RBouling	AVegel, RGN-III	

*Provided SE input by memo

OFFICE	PDIII-1/PM	PDIII-1/PM	PDIII-1/LA	RTSB/SC*	OGC	PDIII-1/SC
NAME	SMiranda	DHood	RBouling	RDennig		CCraig
DATE	4/27/01	4/27/01	4/04/01	3/16/01	5/1/01	5/2/01

DOCUMENT NAME: G:\PDIII-1\Palisades\AMDB0872.wpd
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Palisades Plant

cc:

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 200
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Consumers Energy Company (the licensee) dated December 7, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 200 , and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Consumers Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Claudia M. Craig

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: May 3, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 200

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE	INSERT
3.7.5-1	3.7.5-1
3.7.5-2	3.7.5-2
B 3.7.5-5	B 3.7.5-5
B 3.7.5-6	B 3.7.5-6
B 3.7.5-7	B 3.7.5-7
B 3.7.5-8	B 3.7.5-8
-	B 3.7.5-9

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Two AFW trains shall be OPERABLE.

----------NOTES----------

1. Only one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4.

2. The steam driven pump is only required to be OPERABLE prior to making the reactor critical.

3. Two AFW pumps may be placed in manual for testing, for a period of up to 4 hours.

APPLICABILITY: MODES 1, 2, and 3,
MODE 4 when steam generator is relied upon for heat removal.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more AFW trains inoperable in MODE 1, 2, or 3.	A.1 Restore train(s) to OPERABLE status.	72 hours

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time of Condition A not met. OR Less than 100% of the required AFW flow available to either steam generator. OR Less than two AFW pumps OPERABLE in MODE 1, 2, OR 3.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 30 hours
C. Less than 100% of the required AFW flow available, to both steam generators.	----------NOTE---------- LCO 3.0.3 and all other LCO Required Actions requiring MODE changes or power reductions are suspended until at least 100% of the required AFW flow is available. ---------- C.1 Initiate action to restore one AFW train to OPERABLE status.	Immediately

BASES

APPLICABILITY (continued)

In MODE 4, the AFW System may be used for heat removal via the steam generator.

In MODES 5 and 6, the steam generators are not normally used for decay heat removal, and the AFW System is not required.

ACTIONS

A.1

Condition A is applicable whenever one or more AFW trains is inoperable, in MODE 1, 2, or 3. Action A.1 requires restoration of both trains to OPERABLE status within 72 hours. The 72 hour Completion Time is based on the assumption that at least 100% of the required AFW flow (that assumed in the safety analyses) is available to each steam generator. If the flow available to either steam generator is less than 100% of the required AFW flow, or if less than two AFW pumps are OPERABLE, Condition B must also be entered. In addition, if the combined flow available to both steam generators is less than 100% of the required AFW flow, Condition C must be entered as well.

Mechanical system LCOs typically provide a 72 hour Completion Time under conditions when a required system can perform its required safety function, but may not be able to do so assuming an additional failure. When operating in accordance with the Required Actions of an LCO Condition, it is not necessary to be able to cope with an additional single failure.

The AFW system can provide one hundred percent of the required AFW flow to each steam generator following the occurrence of any single active failure. Therefore, the AFW function can be met during conditions when those components which could be deactivated by a single active failure are known to be inoperable. Under that condition, however, the ability to provide the function after the occurrence of an additional failure cannot be guaranteed. Therefore, continued operation with one or more trains inoperable is allowed only for a limited time.

BASES

ACTIONS
(continued)

B.1 and B.2

Condition B is applicable: 1) when the Required Actions of Condition A cannot be completed within the required Completion Time, 2) when the flow available to either steam generator is less than 100% of the required AFW flow, or 3) when less than two AFW pumps are OPERABLE. Condition A is applicable whenever one or more trains is inoperable. Therefore, when Condition B is applicable, Condition A is also applicable. (If the combined flow available to both steam generators is less than 100% of the required AFW flow, Condition C must be entered as well.) Being in Conditions A and B concurrently maintains both Completion Time clocks for instances where equipment repair allows exit from Condition B while the plant is still within the applicable conditions of the LCO.

Continued plant operation is not allowed if the available AFW flow to either steam generator is less than the required flow, because adequate AFW flow cannot be assured following a main steam line break affecting that steam generator (consider the case where the break occurs in the AFW piping). Therefore, if 1) the inoperable AFW trains cannot be restored to OPERABLE status within the required Completion Time of Condition A, or 2) the flow available to either steam generator is less than 100% of the required AFW flow, or 3) less than two AFW pumps are OPERABLE in MODES 1, 2, and 3, the plant must be placed in a MODE in which the LCO does not apply (except as noted in Condition C). To achieve this status, the plant must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 30 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

BASES

ACTIONS
(continued)

C.1

Condition C is applicable if the combined flow available to both steam generators is less than 100% of the required AFW flow; Condition A is applicable whenever one or more trains is inoperable; and Condition B is applicable when the flow available to either steam generator is less than 100% of the required AFW flow, or when less than two AFW pumps are OPERABLE. Therefore, when Condition C is applicable, Conditions A and B are also applicable. Being in Conditions A, B, and C concurrently maintains the Completion Time clocks for instances where equipment repair allows exit from Condition C while the plant is still within the applicable conditions of the LCO.

One hundred percent AFW flow (that assumed in the safety analyses) can be provided by any one OPERABLE AFW pump and an OPERABLE flow path to each steam generator.

Required Action C.1 is modified by a Note indicating that all required MODE changes or power reductions are suspended until at least 100% of the required AFW flow is available. In this condition, there may be inadequate AFW flow available to remove decay heat and allow a stable plant shutdown.

With less than 100% of the required AFW flow available (ie. less than the AFW flow assumed in the safety analyses, while in MODES 1, 2, and 3, or less than the required AFW train OPERABLE while in MODE 4 with a steam generator relied upon for heat removal), the plant is in a seriously degraded Condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with nonsafety grade equipment. In such a condition, the plant should not be perturbed by any action, including a power change, that might result in a trip. The seriousness of this condition requires that action be started immediately to restore at least 100% of the required AFW flow available. LCO 3.0.3 is not applicable, as it could force the plant into a less safe condition.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.7.5.1

Verifying the correct alignment for the required manual, power operated, and automatic valves in the AFW water and steam supply flow path provides assurance that the proper flow paths exist for AFW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulations; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position.

This test need not be performed for the steam driven AFW pump for MODE 4 operation.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

SR 3.7.5.2

Verifying that each required AFW pump's developed head at the flow test point is greater than or equal to the required developed head ensures that AFW pump performance has not degraded during the cycle. Flow and differential head are normal tests of pump performance required by Section XI of the ASME Code (Ref. 2). This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance.

This SR is modified by a Note indicating that this SR for the turbine driven AFW pump does not have to be met in MODE 3 when steam pressure is below 800 psig. This is because there is insufficient steam pressure and pump discharge pressure to allow the turbine driven pump to reach the normal test conditions.

Performance of inservice testing, discussed in the ASME Code, Section XI (Ref. 2), at 3 month intervals satisfies this requirement.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.5.3

This SR ensures that AFW can be delivered to the appropriate steam generator, in the event of any accident or transient that generates an AFAS, by demonstrating that each automatic valve in the flow path actuates to its correct position on an actual or simulated actuation signal. Specific signals (e.g., AFAS) are tested under Section 3.3, "Instrumentation." This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is acceptable, based on the design reliability and operating experience of the equipment.

This SR is modified by a Note which states the SR is only required to be met in MODES 1, 2, and 3 when AFW is not in operation. With AFW in operation, the required trains are already aligned with the flow control valves in manual control.

SR 3.7.5.4

This SR ensures that the AFW pumps will start in the event of any accident or transient that generates an AFAS by demonstrating that each AFW pump starts automatically on an actual or simulated actuation signal. Specific signals (e.g., AFAS, handswitch) are tested under Section 3.3, "Instrumentation."

This test need not be performed for the steam driven AFW pump for MODE 4 operation.

The 18 month Frequency is acceptable, based on the design reliability and operating experience of the equipment.

This SR is modified by a Note. The Note states that the SR is only required to be met in MODES 1, 2, and 3. In MODE 4, the required pump is already operating and the autostart function is not required.

REFERENCES

1. FSAR, Section 9.7

2. ASME, Boiler and Pressure Vessel Code, Section XI, Inservice Inspection, Article IWV-3400.

3. Palisades Design Basis Document 1.03, Auxiliary Feedwater System, Section 3.4.1.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 200 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS ENERGY COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By application dated December 7, 2000, the Consumers Energy Company (the licensee) requested an amendment to the Technical Specifications (TSs) for the Palisades Plant. This safety evaluation addresses the portion of the December 7, 2000, application related to Technical Specification Task Force Change Number 325, Revision 0 (TSTF-325R0), "ECCS Conditions and Required Actions with < 100% Equivalent ECCS Flow." The proposed amendment would change TS 3.7.5, "Auxiliary Feedwater System (AFW)," regarding the Limiting Conditions for Operation (LCOs) for the AFW to be similar to changes to the "Standard Technical Specifications, Combustion Engineering Plants," NUREG 1432, Revision 1, made by the Nuclear Energy Institute TSTF-325R0. Specifically, the following changes to Palisades TS 3.7.5 are proposed:

1. The second and third parts of the Condition A statement, "AND - At least 100% of the required AFW flow available to each steam generator - AND - At least two AFW pumps OPERABLE," would be deleted.

2. The second part of the Condition B statement, "One or more AFW trains inoperable ...," would be replaced with the following two new parts: "Less than 100% of the required AFW flow available to either steam generator - OR - Fewer than two AFW pumps OPERABLE in mode 1, 2, OR 3."

3. The wording of Condition C would be revised to address the condition in which there is insufficient AFW flow available to achieve a plant shutdown while in any mode within the applicable conditions of TS 3.7.5.

4. An editorial change would be made to Note 2, changing the word "operable" to upper case letters.

The December 7, 2000, application also forwarded associated changes to the TS Bases.

In addition, the licensee requested (1) changes to additional systems similar to the changes in TSTF-325R0, and (2) additional changes based upon TSTFs other than TSTF-325R0. The NRC staff will address those changes by separate correspondence.

2.0 BACKGROUND

When the Palisades TSs were converted to improved TSs (ITS), the ITS included action requirements for the ECCS based on TS 3.5.2, "Emergency Core Cooling Systems--Operating," of NUREG-1432, Revision 1 (STS). Because of plant-specific design considerations, the NRC staff also approved similar action requirements for TS 3.7.5 regarding the AFW. These action requirements would permit continued operation for the specified completion time (72 hours) in the event components from both "trains" of the specified system were inoperable, provided at least one train's capability remained operable using the remaining operable components. For example, in TS 3.5.2, such ECCS inoperabilities are addressed with the following condition statement:

> One or more trains of ECCS inoperable for reasons other than Condition A.
>
> AND
>
> At least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.

This approach could lead to problems in actual use due to the strict logic rules of the STS. Stating the condition in this way allows inoperabilities to be present in both trains, as long as 100-percent equivalent ECCS flow is available. If a situation were to subsequently occur which resulted in less than 100-percent equivalent ECCS flow, LCO 3.0.3 would require an immediate plant shutdown. However, with less than 100-percent equivalent ECCS flow operable, the above stated conditions would no longer exist, and by the completion time rules of TS Section 1.3, "Completion Time," the condition and required actions would be exited and its 72-hour completion time clock reset. If flow is then restored, reentry into the condition would incorrectly result in an additional 72-hour completion time, without ever having returned a train to operable status. This is contrary to the intent of TS Section 1.3. According to TS Section 1.3, the TS should not allow exiting the condition and required actions and resetting the 72-hour completion time clock upon entering LCO 3.0.3. The condition and required actions should remain applicable until both trains of ECCS are restored to operable status or the plant is placed outside the ECCS specification's mode of applicability.

In response to this logic problem, the industry proposed a generic change, TSTF-325R0, to revise the ECCS specification's action requirements to conform to the intent of STS Section 1.3. This was accomplished by splitting the STS condition into two separate conditions so that the required action for an inoperable train remains applicable regardless of overall remaining ECCS flow availability, and so that the completion time clock is not reset in the event flow is restored. Specifically, the split results in the following two conditions:

> One or more trains of ECCS inoperable for reasons other than Condition A;

And a new condition,

> Less than 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available.

Stating the original condition as two separate conditions ensures the intent of STS Section 1.3 is met. In the event the plant enters the new condition addressing low flow, entry into LCO 3.0.3 would be required. However, by TS Section 1.3, the plant would also remain in the inoperable train condition, enabling a smooth transition in the event flow capability were restored, so that the low flow condition would no longer apply and could, thus, be exited. Because this clarification of the action requirements does not change the technical basis of the specification, the NRC staff approved TSTF-325R0.

3.0 EVALUATION

In view of the above clarification achieved by TSTF-325R0, the Palisades licensee proposed to adopt similar changes for TS 3.7.5. The NRC staff's evaluation for each of the four proposed changes, identified in Section 1.0 above, is presented below.

3.1 Change No. 1

To remove the conflict addressed by TSTF-325R0, the second and third condition statements of existing Condition A are moved to separate condition statements in revised Condition B. (Note that use of the logical connector OR in a condition statement is equivalent to specifying a separate lettered condition, with its own required actions and completion times. Whenever the required actions are the same for two or more independent conditions, it is often the practice of the STS format to present these conditions in a single row in the actions table, using the logical connector OR to indicate the independence of the conditions.)

Without this change, Condition A could be exited whenever there was less than 100-percent flow available to each steam generator and/or more than one AFW pump was inoperable. This would conflict with the intention of TS Section 1.3, which would expect Condition A to remain applicable as long as one or more AFW trains were inoperable.

Moving the second and third condition statements of Condition A to Condition B as independent conditions will ensure that, regardless of the number of inoperable AFW trains, the TS will require a plant shutdown to Mode 4 when there is less than 100-percent of the required AFW flow available to either steam generator and/or more than one AFW pump is inoperable.

The proposed revision to the format of Conditions A and B is an administrative change because it does not alter the existing restrictions on plant operation, but only clarifies the intent of the existing action requirements, making them consistent with the completion time rules of Palisades TS 1.3, "Completion Time." Therefore, because this change is purely administrative and does not change the technical basis of TS 3.7.5, the NRC staff finds that it is acceptable.

3.2 Change No. 2

The second condition statement of Condition B is replaced with the second condition statement in the revised Condition B. The phrase in the existing condition statement "at least 100% of the required AFW flow available in Modes 1, 2, or 3" would include both the situation in which only one steam generator was available to receive 100-percent flow and the situation in which two steam generators together, but not individually, were available to receive 100-percent flow. As explained in the proposed Bases for Action B, the new condition statement "less than 100% of required AFW flow available to either steam generator" would include the situation in which

neither steam generator could receive 100-percent flow, but together they could. This change is administrative because the new condition statement is equivalent to the existing condition statement. Thus, this change does not alter the existing restrictions on plant operation. Because this change is purely administrative and does not change the technical basis of TS 3.7.5, the NRC staff finds that it is acceptable.

3.3 Change No. 3

The first condition statement of existing Action C only applies with the plant in Mode 1, 2, or 3. In addition, the second independent condition statement of existing Action C only applies with the plant in Mode 4 when one AFW train is required to be operable. The Palisades licensee proposed replacing these condition statements with an equivalent condition statement that applies whenever TS 3.7.5 is applicable (Modes 1, 2, and 3, and Mode 4 when steam generators are relied upon for heat removal).

Action C addresses the situation in which AFW capability is so degraded that it cannot supply sufficient flow to effect a safe plant shutdown and cooldown. This includes situations such as all three AFW pumps inoperable or loss of capability to supply 100 percent of flow assumed in the safety analysis, even using both steam generators. The proposed condition statement "less than 100% of the required AFW flow available, to both steam generators" encompasses these situations.

This change is administrative because the new condition statement is equivalent to the two existing condition statements. Thus, this change does not alter the existing restrictions on plant operation. Because this change is purely administrative and does not change the technical basis of TS 3.7.5, the NRC staff finds that it is acceptable.

3.4 Change No. 4

In conjunction with the other administrative changes to TS 3.7.5, the Palisades licensee also proposed an editorial change to LCO 3.7.5, Note 2, replacing "operable" with "OPERABLE." This change is appropriate because the term is used as it is defined in Palisades TS 1.1, "Definitions." Because this change is purely administrative and does not change the technical basis of TS 3.7.5, the NRC staff finds that it is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The Michigan State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment

involves no significant hazards consideration and there has been no public comment on such finding (66 FR 7674). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: C. Harbuck

Date: May 3, 2001