Docket No. 50-255

October 19, 1977

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Consumers Power Company ATTN: Mr. Dave Bixel Nuclear Licensing Administrator 212 West Michigan Avenue Jackson, Michigan 49201

Gentlemen:

The Commission has issued the enclosed Amendment No. 30 to Provisional Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your request dated September 23, 1977.

This amendment makes revisions to the Chapter 4 surveillance interval definitions to bring them into conformance with the Standard Technical Specifications and also provides clarification of certain existing surveillance requirements.

Copies of the Safety Evaluation and Notice of Issuance are also enclosed.

Sincerely,

/s/

A. Schwencer, Chief Operating Reactors Branch #1 Division of Operating Reactors

#### Enclosures:

- 1. Amendment No. 30 to DPR-20
- 2. Safety Evaluation
- 3. Notice

cc w/enclosures:
See next page

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### UNITED STATES NUCLIAR REGULATORY COMMISSION WASHINGTON, D. C. 20556

October 19, 1977

Docket No. 50-255

Consumers Power Company ATTN: Mr. Dave Bixel Nuclear Licensing Administrator 212 West Michigan Avenue Jackson, Michigan 49201

Gentlemen:

The Commisssion has issued the enclosed Amendment No.30 to Provisional Operating License No. UPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your request dated September 23, 1977.

This amendment makes revisions to the Chapter 4 surveillance interval definitions to bring them into conformance with the Standard Technical Specifications and also provides clarification of certain existing surveillance requirements.

Copies of the Safety Evaluation and Notice of Issuance are also enclosed.

Sincerely,

A. Schwencer, Chief

Operating Reactors Branch #1 Division of Operating Reactors

#### Enclosures:

1. Amendment No. 30 to DPR-20

2. Safety Evaluation

3. Notice

cc w/enclosures: See next page cc: M. I. Miller, Esquire
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## UNITED STATES JCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

#### CONSUMERS POWER COMPANY

DOCKET NO. 50-255

#### PALISADES PLANT

#### AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No.30 License No. DPR-20

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Consumers Power Company (the licensee) dated September 23, 1977, 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; and
  - 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 this license amendment and paragraph 3.B of Facility License No. DPR-20 is hereby amended to read as follows:
  - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 30, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A. Schwencer, Chief

Operating Reactors Branch #1 Division of Operating Reactors

Attachment: Changes to the Technical Specifications

Date of Issuance: October 19, 1977

#### ATTACHMENT TO LICENSE AMENDMENT NO.30

#### PROVISIONAL OPERATING LICENSE NO. DPR-20

#### DOCKET NO. 50-255

#### Revise Appendix A as follows:

Remove the following pages and replace with identically numbered revised pages:

4-1

4-3

4-5

4-8

4-9 4-10

4-11

4-12

Marginal lines indicate changed area.

#### 4.0 SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance requirements shall be applicable during the reactor operating conditions associated with individual Limiting Conditions for Operation unless otherwise stated in an individual surveillance requirement.
- 4.0.2 Unless otherwise specified, each surveillance requirement shall be performed within the specified time interval with:
  - a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
  - b. A total maximum combined interval time for any three consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

#### 4.1 <u>INSTRUMENTATION AND CONTROL</u>

#### Applicability

Applies to the reactor protective system and other critical instrumentation and controls.

#### <u>Objective</u>

To specify the minimum frequency and type of surveillance to be applied to critical plant instrumentation and controls.

#### Specifications

Calibration, testing, and checking of instrument channels, reactor protective system and engineered safeguards system logic channels and miscellaneous instrument systems and controls shall be performed as specified in Tables 4.1.1 to 4.1.3.

#### Basis

Failures such as blown instrument fuses, defective indicators, and faulted amplifiers which result in "upscale" or "downscale" indication can be easily recognized by simple observation of the functioning of an instrument or system. Furthermore, such failures are, in many cases, revealed by alarm or annunciator action and a check supplements this type of built-in surveil-lance.

Based on experience in operation of both conventional and nuclear plant systems when the plant is in operation, a checking frequency of once-pershift is deemed adequate for reactor and steam system instrumentation. Calibrations are performed to insure the presentation and acquisition of accurate information.

The power range safety channels are calibrated daily against a heat balance standard to account for errors induced by changing rod patterns and core physics parameters.

	Channel Description		Surveillance Function	Frequency		Surveillance Method
1.	Power Range Safety Channels	a. b. c. d.	Check Check(3) Test Calibrate	S D M <sup>(2)</sup> R	a. b. c. d.	Comparison of four-power channel readings. Channel adjustment to agree with heat balance calculation. Repeat whenever flux-AT power comparator alarms. Internal test signal.(4) Channel alignment through measurement/ adjustment of internal test points.
2.	Wide-Range Logarithmic Neutron MOnitors	a. b.	Check Test	S P	a. b.	Comparison of both wide-range readings. Internal test signal.
3.	Reactor Coolant Flow	а.	Check	S	а.	indications.
	, \$e	b. c.	Calibrate Test	R M <sup>(2)</sup>	ь.	sensors. (1)(4)
h.	Thermal Margin/Low Pressurizer Pressure	a. b.	Check: (1) Temperature	s R	а. b.	Check: (1) Comparison of four separate calculated trip pressure set point indications. (2) Comparison of four pressurizer pressure indications. (Same as 5(a) below.) Calibrate:
			(1) Temperature Input (2) Pressure Input	(2)		(1) Known resistance substituted for RTD coincident with known pressure input. (2) Part of 5(b) below.
		с.	Test	<sub>M</sub> (2)	c.	Bistable trip tester. (1)(4)
5.	High-Pressurizer Pressure	a.	Check	S	a.	Comparison of four separate pressure indications.
		ъ. с.	Calibrate Test	<mark>M</mark> (2)	ъ. с.	Known pressure applied to sensors. Bistable trip tester. $(1)$

‡ (J)

Amendment No. 30

TABLE 4.1.1

Minimum Frequencies for Checks, Calibrations and Testing of Reactor Protective System (5) (Contd)

- <del> </del>	Channel Description		Surveillance Function	Frequency		Surveillance Method
6.	Steam Generator Level	a.	Check	S	a.	Comparison of four level indications per generator.
		ъ.	Calibrate	R		Known differential pressure applied to
		с.	Test	м <sup>(2)</sup>	c.	Bistable trip tester. (1)
7.	Steam Generator Pressure	a.	Check	s.	a.	
		b.	Calibrate	R(2)	b.	Known pressure applied to sensors.
		c.	Test	M'-7	с.	Bistable trip tester. (1)
8.	Containment Pressure	a.	Calibrate	R M(2)	a.	Known pressure applied to sensors.
		ъ.	Test	M(2)	ъ.	Simulate pressure switch action.
9.	Loss of Load	a.	Test	P	a.	Manually trip turbine auto stop oil relays.
10.	Manual Trips	a.	Test	P	a.	Manually test both circuits.
11.	Reactor Protection System Logic Units	a.	Test	м <sup>(2)</sup>	a.	Internal test circuits.

Notes: (1) The bistable trip tester injects a signal into the bistable and provides a precision readout of the trip set point.

- (2) All monthly tests will be done on only one of four channels at a time to prevent reactor trip.
- (3) Adjust the nuclear gain pot on the AT cabinet until readout agrees with heat balance calculations.
- (h) Trip setting for operating pump combination only. Settings for other than operating pump combinations must be tested during routine monthly testing performed when shut down and within four hours after resuming operation with a different pump combination if the setting for that combination has not been tested within the previous month.
- (5) It is not necessary to perform the specified testing during prolonged periods in the regueling shutdown condition. If this occurs, omitted testing will be performed prior to returning the plant to service.

TABLE 4.1.1

Minimum Frequencies for Checks, Calibrations and Testing of Reactor Protective System (5) (Contd)

#### FREQUENCY NOTATION

Notation	Frequency
s	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
М	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 6 months.
R	At least once per 18 months.
Р	Prior to each start-up if not done previous week.
NA	Not applicable.

	Channel Description	Surveillance Function	Frequency	Surveillance Method
1.	Low-Pressure SIS Initiation Channels	a. Check	S	<ul> <li>a. Comparison of four separate pressure indications.</li> </ul>
	Chamiers	b. Test (1)	2.	b. Signal to meter relay adjust with test device to verify SIS actuation logic.
		c. Test	M(5)	c. Signal to meter relay adjusted with test device.
2.	Low-Pressure SIS Signal Block Permissive and Auto Reset	a. Test (1)	R	a. Part of 1(b) above.
. 3.	. SIS Actuation Relays	a. Test	Ų	a. Simulation of SIS 2/4 logic trip using built-in testing system. Both "standby power" and "no standby power" circuits
`	<b>t</b> -			will be tested for left and right chan- nels. Test will verify functioning of initiation circuits of all equipment normally operated by SIS signals.
		b. Test	R	b. Complete automatic test initiated by same method as Item 1(b) and including all normal automatic operations.
+ ≥ 4	. Containment High-Pressure	a. Calibrate	R	a. Known pressure applied to sensors.
٠ ب	Channels	b. Test	R	b. Simulation of CHP 2/4 logic trip to verify actuation logic for SIS, con-
,		c. Test	<sub>M</sub> (2)	tainment isolation and containment spray c. Pressure switch operation simulated by opening or shorting terminals or pres- sure applied to the switch.
5	. Containment High Radiation Channels	a. Check	D	a. Comparison of four separate radiation level indications.
	Cuamers	b. Calibrate	R	<ul> <li>Exposure to known external radiation source.</li> </ul>

Amendment No.

TABLE 4.1.2

Minimum Frequencies for Checks, Calibrations and Testing of Engineered Safety Feature Instrumentation Controls (Contd)

		Channel Description	-	Surveillance Function	Frequency		Surveillance Method
	5.	Containment High Radiation Channels (Contd)	с.	Test	M(5)	с.	Remote-operated integral radiation check source used to verify instrument operation.
			d.	Test	ß	d.	
	6.	Manual SIS Initiation	a.	Test	R	a.	Manual push-button test.
	7.	Manual Containment Isola- tion Initiation	а. b.	Test Check	R R	а. b.	Manual push-button test. Observe isolation valves closure.
t	8.	Manual Initiation Contain- ment Spray Pumps and Valves	a.	Test	R	a.	Manual switch operation.
-1 1	9.	DBA Sequencers	a.	Test	ଦ	a.	Proper operation will be verified during SIS actuation test of Item 3(a) above.
	10.	Normal Shutdown Sequencers	a.	Test	ħ	a.	·
	1.1.	Diesel Start	a.	Test	М	a.	Manual initiation followed by synchronizing and loading.
			ъ.	Test .	R	b.	Diesel start, load shed, synchronizing and loading will be verified during
			с.	Test	P	c.	Item 3(b) above. Diesel auto start initiating circuits.
	12.	SIRW Tank Level Switch Interlocks	a.	Test	R	a.	Level switches removed from fluid to
			b.	'lest	Q	b.	verify actuation logic. Use SIRW tank control switch to verify actuation of valves.

TABLE 4.1.2

Minimum Frequencies for Checks, Calibrations and Testing of Engineered Safety Feature Instrumentation Controls (Contd)

		Channel Description		Surveillance Function	Frequency		Surveillance Method	
	13.	Safety Injection Tank Level and Pressure Instruments	a.	Check	S	a.	Verify that level and pressure indication is between independent high high/low alarms for level and pressure.	
		•	b.	Calibrate	R	b.	Known pressure and differential pressure applied to pressure and level sensors.	(
	14.	Boric Acid Tank Level Switches	а,	Test	R	a.	Pump tank below low-level alarm point to verify switch operation.	
	15.	Boric Acid Heat Tracing System	a.	Check	D	a.	Observe temperature recorders for proper readings.	
-	16.	Main Steam Isolation Valve	a.	Check	S	a.	The real real probability	
~		Circuits	ъ.	Test(3)	R	b.	cations.  Signal to meter relay adjusted with test device to verify MSIV circuit logic.	
	17.	SIRW Tank Temperature	а.	Check	M	a.	Compare independent temperature readouts.	
		Indication and Alarms	b.	Calibrate	R	b.	Known resistance applied to indicating loop.	
	18.	Low-Pressure Safety Injection Flow Control Valve CV-3006	a.	Check	Р	a.	Observe valve is open with air supply isolated.	(
	19.	Safety Injection Bottle Isolation Valves	a.	Check	P	a.	Ensure each valve open by observing valve position indication and valve itself. Then lock open breakers (at MCC-9) and control power (key switch in control room).	
	20.	Safety Injection Miniflow Valves CV-3027, 3056	а.	Check	Р	a.	Verify valves open and HS-3027 and 3056 positioned to maintain them open.	

Notes: (1) Calibration of the sensors is performed during calibration of Item 5(b), Table 4.1.1.

(2) All monthly tests will be done on only one channel at a time to prevent protection system actuation.

(3) Calibration of the sensors is performed during calibration of Item 7(b), Table 4.1.1.

#### FREQUENCY NOTATION

Notation	Frequency
${\tt S}$	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
M	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 6 months.
R	At least once per 18 months.
r P	Prior to each start-up if not done previous week.
NΛ	Not applicable.

 $\frac{\text{TABLF 4.1.3}}{\text{Minimum Frequencies for Checks, Calibrations and Testing of Miscellaneous Instrumentation and Controls (Contd)}.$ 

	Channel Description		Surveillance Function	Frequency		Surveillance Method
8.	Control Rod Drive System Interlocks	a.	Test	R	a.	Verify proper operation of all rod drive control system interlocks, using simulated
		ъ.	Test	Р	ъ.	signals where necessary. Same as $8(a)$ above, if not done within three months.
9.	Turbine Runback	a.	Test	М	a.	Check combination nuclear instrumentation and rod drive control system signal with
		ъ.	Test	R	ъ.	test circuit. Insert rod drives below lower electrical limit to verify runback signal initiation.
10.	Flux-AT Power Comparator	а. b.	Calibrate Test	R M	a. b.	Use simulated signals. Internal test signal.
11.	Calorimetric Instrumentation	a.	Calibrate	R	a.	Known differential pressure applied to feed-water flow sensors.
12.	Containment Building Humidity Detectors	a.	Test	R	a.	Expose sensor to high humidity atmosphere.
13.	Interlocks - Isolation Valves on Shutdown Cooling Line	a.	Calibrate	R	a.	Known pressure applied to sensor.
14.	Service Water Break Detector in Containment	a.	Test	R	a.	Known differential pressure applied to sensors.
15.	Control Room Ventilation	a.	Test	R	a.	Check damper operation for DBA mode with
		b.	Test	R	ъ.	HS-1801 and isolation signal. Check control room for positive pressure.

£

Minimum Frequencies for Checks, Calibrations and Testing of Miscellaneous Instrumentation and Controls (Contd)

#### FREQUENCY NOTATION

Notation	Frequency
S	At least once per 12 hours.
D	At least once per 24 hours.
W	At least once per 7 days.
М	At least once per 31 days.
Q	At least once per 92 days.
SA	At least once per 6 months.
R	At least once per 18 months.
8- P	Prior to each start-up if not done previous week.
NA	Not applicable.
Α	**At least once per 12 months.

<sup>\*\*</sup>NOTE: This interval is included as on interval not included in the standard Technical Specifications but required by the present commitments.



### UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20585

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING AMENDMENT NO. 30 TO PROVISIONAL OPERATING LICENSE NO. DPR-20

#### CONSUMERS POWER COMPANY

PALISADES PLANT

**DOCKET NO. 50-255** 

#### Introduction

By letter dated September 23, 1977, Consumers Power Company (the licensee) requested changes in the Technical Specifications appended to Provisional Operating License No. DPR-20 for operation of the Palisades Plant located in Van Buren County, Michigan. The proposed changes would bring the Chapter 4 surveillance interval requirements into conformity with those defined in the Standard Technical Specifications and would also provide a clarification of certain existing surveillance requirements.

#### Discussion

The major changes that would occur by changing the present Palisades surveillance intervals to be consistent with the Standard Technical Specifications (STS) are for those items on an "R" interval, which is now defined as "each refueling shutdown, but not to exceed 16 months". The revised interval for the "R" items would be "at least once every 18 months". The surveillance of these items would therefore be strictly on a calendar basis and not tied to the refueling outage schedule. The surveillance of other items would remain essentially on the presently established intervals, although those intervals would be more clearly defined.

The remaining changes proposed by the licensee would clarify certain surveillance requirements, modify testing methods to reflect those actually used and remove a potential ambiguity that exists in the present Technical Specifications.

#### Evaluation

The licensee's proposed changes to modify the surveillance interval definitions specified in Chapter 4 of the Palisades Technical Specifications would bring those definitions into conformity with the Standard Technical Specifications (STS). As indicated above, the major change that would occur would be for those items on an "R", or refueling interval, which are presently required to be performed each refueling shutdown, but at least once every 16 months. Surveillance of all other items would continue to be performed at the presently established intervals except that these intervals would be more specifically defined on a time basis. For example, the present "S" (shift) interval would be defined as "at least once per 12 hours" instead of "each shift" and the "M" (Monthly) interval, would be defined as "at least once per 31 days".

The STS "R" surveillance interval is not based on the refueling event, which cannot be predicted with certainty, but on a specific calendar basis of at least once every 18 months. The basis for this is that experience had shown that the actual time period between core refuelings at a given facility may vary due to unscheduled maintenance outages or operation at a higher or lower than expected power demand level. Those items on an "R" interval, however, usually require cold shutdown conditions to be performed. An eighteen month interval has been determined to be appropriate for the surveillance of these items, from a technical standpoint. We have reviewed the Palisades "R" interval surveillance items and have concluded that increasing the interval from a maximum of 16 months to 18 months would have an insignificant effect. This interval of 18 months is also consistent with our current policy for surveillance of items on an "R" interval. Also, since the inspection intervals for all other items will remain on essentially the same schedule we conclude that the licensee's proposed redefinition of these intervals on a specific, non ambigous time basis, is acceptable.

The licensee has also proposed to modify the surveillance requirements for the power range, safety channels to be consistent with the STS by clarifying the adjustment and calibration requirements and by adding a calibration surveillance function to be performed on an "R" interval. Since the present surveillance functions would remain and the proposed change represents an increase in the surveillance performed on the power range safety channels, we find this change to be acceptable.

Another change proposed by the licensee would modify the required method by which operation of the Containment High Pressure Channel pressure switches are to be tested to include the actual method used, i.e. by applying pressure to the switches. Since this is equally as effective as the other method described in which the pressure switche terminals are opened or shorted to simulate operation, we conclude that this change is acceptable.

The final change proposed by the licensee would modify the present wording regarding the total maximum interval of time allowed for any three consecutive surveillance intervals, to remove the potential for ambiguity and to conform to the intent of the STS. We consider this change to be administrative in nature, consistent with the NRC staff's intents, and acceptable.

#### **Environmental Considerations**

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to  $10~\rm CFR$  Section 51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

#### Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: October 19, 1977

#### UNITED STATES NUCLEAR REGULATORY COMMISSION

#### DOCKET NO. 50-255

#### CONSUMERS POWER COMPANY

### NOTICE OF ISSUANCE OF AMENDMENT TO PROVISIONAL OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 30 to Provisional Operating License No. DPR-20, issued to Consumers Power Company (the licensee), which revised Technical Specifications for operation of the Palisades Plant, (the facility) located in Covert Township, Van Buren County, Michigan. The amendment is effective as of its date of issuance.

This amendment makes revisions to the Chapter 4 surveillance interval definitions to bring them into conformance with the Standard Technical Specifications and also provides clarification of certain existing surveillance requirements.

The application for the amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR \$51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment dated September 23, 1977, (2) Amendment No. 30 to License No. DPR-20, and (3) the Commission's related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C. 20555 and at the Kalamazoo Public Library, 315 South Rose Street, Kalamazoo, Michigan 49006. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Operating Reactors.

Dated at Bethesda, Maryland this 19th day of October 1977.

FOR THE NUCLEAR REGULATORY COMMISSION

Schwencer, Chief

Operating Reactors Branch #1 Division of Operating Reactors