



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

May 5, 1980

Docket No. 50-255

Mr. David P. Hoffman  
Nuclear Licensing Administrator  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

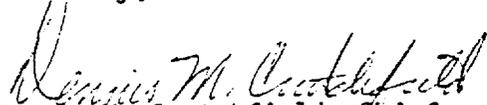
Dear Mr. Hoffman:

On September 10, 1979 we issued Amendment No. 51 to Provisional Operating License No. DPR-20 for the Palisades Plant. The amendment authorized changes that would enhance low temperature over pressure protection. It has been brought to our attention that the changes to the Technical Specifications issued with the amendment contained two errors. The Basis of Section 3.1.8 in p. 3-25a referred to a PCS vent opening of 1.4 square inches. The opening specified in Section 3.1.8 is 1.3 square inches and this should also be the opening referred to in the Basis. Section 4.6.1c on p. 4-39 requires that all high pressure safety injection pumps except those otherwise required to be operable shall be demonstrated inoperable at least once per twelve hours whenever temperature of one or more of the PCS cold legs is  $<250^{\circ}\text{F}$ . The specification, as issued, would require this surveillance even with the vessel head removed. The purpose of the limitation in high pressure safety injection pump operability and associated surveillance is to limit an over pressurization event from a mass addition caused by HPCI pump operation. Obviously, such an over pressurization could not occur with the vessel head removed. Therefore, we have revised the specification so that surveillance would not be required with the head removed.

The errors on pages 3-25a and 4-39 have been corrected by the enclosed replacement pages. We regret any inconvenience caused by these errors.

It has also been brought to our attention that one of the specifications issued by Amendment No. 51 could be interpreted differently than we had intended. Section 4.1.1.a.1 on page 4-1 requires performance of a channel functional test on the PORV actuation channel, but excluding valve operation, within 31 days prior to entering a condition in which the PORV is required to be operable and at least once per 31 days thereafter when the PORV is required to be operable. This specification permits performance of the required channel functional tests without operating the valve. The specification does not prohibit performance of channel functional tests which include valve operation.

Sincerely,

  
Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
Division of Licensing

Enclosures: As Stated

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cc

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### 3.1.8 Overpressure Protection Systems Specifications

- a. When the temperature of one or more of the primary coolant system cold legs is  $\leq 250^{\circ}\text{F}$ , two power operated relief valves (PORVs) with a lift setting of  $\leq 400$  psia, or a reactor coolant system vent of  $\geq 1.3$  square inches shall be operable except as specified below:
- (1) With one PORV inoperable, either restore the inoperable PORV to operable status within 7 days or depressurize and vent the PCS through a  $\geq 1.3$  square inch vent(s) within the next 8 hours; maintain the PCS in a vented condition until both PORVs have been restored to operable status.
  - (2) With both PORVs inoperable, depressurize and vent the PCS through a  $\geq 1.3$  square inch vent(s) within 8 hours; maintain the PCS in a vented condition until both PORVs have been restored to operable status.
- b. In the event either the PORVs or the PCS vent(s) are used to mitigate a PCS pressure transient, a Special Report shall be prepared and submitted to the Commission within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or vent(s) on the transient and any corrective action necessary to prevent recurrence.

#### Basis

The OPERABILITY of two PORVs or an PCS vent opening of greater than 1.3 square inches ensures that the PCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the PCS cold legs are  $\leq 250^{\circ}\text{F}$ . Either PORV has adequate relieving capability to protect the PCS from overpressurization when the transient is limited to either (1) the start of an idle PCP with the secondary water temperature of the steam generator  $\leq 70^{\circ}\text{F}$  above the PCS cold leg temperatures or (2) the start of a HPSI pump and its injection into a water solid PCS. <sup>(1)</sup>

#### References

- (1) "Palisades Plant Overpressurization Analysis," June, 1977, and "Palisades Plant Primary Coolant System Overpressurization Subsystem Description," October, 1977.

(correction)

#### 4.6 SAFETY INJECTION AND CONTAINMENT SPRAY SYSTEMS TESTS

##### Applicability

Applies to the safety injection system, the containment spray system, chemical injection system and the containment cooling system tests.

##### Objective

To verify that the subject systems will respond promptly and perform their intended functions, if required.

##### Specifications

#### 4.6.1 Safety Injection System

- a. System tests shall be performed at each reactor refueling interval.  
A test safety injection signal will be applied to initiate operation of the system. The safety injection and shutdown cooling system pump motors may be de-energized for this test.
- b. The system test will be considered satisfactory if control board indication and visual observations indicate that all components have received the safety injection signal in the proper sequence and timing (ie, the appropriate pump breakers shall have opened and closed, and all valves shall have completed their travel).
- c. All high pressure safety injection pumps except those otherwise required to be operable shall be demonstrated inoperable at least once per 12 hours whenever the temperature of one or more of the PCS cold legs is  $<250^{\circ}\text{F}$  and the vessel head is not removed by verifying that the control system fuses and their fuse holders for the HPSI pumps (P66A, P66B and P66C) have been removed from the circuit.

#### 4.6.2 Containment Spray System

- a. System tests shall be performed at each reactor refueling interval.  
The test shall be performed with the isolation valves in the spray supply lines at the containment blocked closed. Operation of the system is initiated by tripping the normal actuation instrumentation.
- b. At least every five years the spray nozzles shall be verified to be open.
- c. The test will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

#### 4.6.3 Pumps

- a. The safety injection pumps, shutdown cooling pumps, and containment spray pumps shall be started at intervals not to exceed three months. Alternate manual starting between control room console and the C-33 panel shall be practiced in the test program.

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Sincerely,

Original signed by

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DATE	5/1/80	5/1/80					5/1/80

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 HSmith  
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