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Docket No. 50-255
LS05-82-03-071

March 12, 1982

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Mr. David P. Hoffman
Nuclear Licensing Administrator
Consumers Power Company
1945 W. Parnall Road
Jackson, Michigan 49201

Dear Mr. Hoffman:

SUBJECT: SNUBBER SURVEILLANCE - PALISADES PLANT

The Commission has issued the enclosed Amendment No. 69 to Provisional Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your application dated September 2, 1981.

The changes to the Appendix A Technical Specifications incorporate the revised version of the Inservice Surveillance Requirements for snubbers in response to our request dated March 23, 1981.

Certain modifications to your proposed changes were necessary to meet our criteria. These modifications have been discussed with and agreed to by your staff.

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

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DSU USE (04)

Sincerely,

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

Enclosures:
1. Amendment No. 69 to License No. DPR-20
2. Safety Evaluation
3. Notice of Issuance

cc w/enclosures:
See next page

L. Engle
3/12/82

FR NOTICE + AMENDMENT

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

CONSUMERS POWER COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 69
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 2, 1981, 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.

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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 Provisional Operating License No. DPR-20 is hereby amended to read as follows:

   B. Technical Specifications

   The Technical Specifications contained in Appendices A and B (Environmental Protection Plan), as revised through Amendment No. 69, 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

Dennis M. Crutchfield

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 12, 1982

ATTACHMENT TO LICENSE AMENDMENT NO. 69

PROVISIONAL OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Revise Appendix A Technical Specifications by removing the following pages and by inserting the enclosed pages. The revised pages contain the captioned amendment number and marginal lines indicating the area of change.

REMOVE PAGES

3-88 through 3-91

4-71 through 4-74

6-27 & 6-28*

INSERT PAGES

as stated above, and

4-72a

*Included for pagination purposes only.

3.20 Shock Suppressors (Snubbers)

Applicability

Applies to the operating status of the safety-related piping shock suppressors (snubbers) as listed in Tables 3.20.1 and 3.20.2.

Objective

To minimize the possibility of unrestrained pipe motion as might occur during an earthquake or severe transient.

Specification

3.20.1 During all modes of operation, except cold shutdown and refueling, all snubbers listed in Tables 3.20.1 and 3.20.2 shall be operable except as noted below:

a. With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.16.1.c on the supported component or declare the supported system inoperable.

TABLE 3.20.1
Safety-Related Hydraulic Shock Suppressors (Snubbers)

Palisades ID Number	System	Location	Snubber In High Radiation Area During Shutdown*	Snubbers Especially Difficult To Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
1	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
2	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
3	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
4	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
5	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
6	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
7	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
8	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
9	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
10	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
11	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
12	MSS	On Main Steam Lines - EB1 Upstream of MSIVs				X
15	MSS	EB-1-8" Upstream of CV-0781				X
16	MSS	EB-1-8" Upstream of CV-0781				X
17	MSS	EB-1-8" Upstream of CV-0780				X
18	MSS	EB-1-8" Upstream of CV-0780				X
19	MSS	FBD-6, E-507, 36" Steam to Aux FW Turbine				X
20	MSS	FBD-6, E-507, 36" Steam to Aux FW Turbine				X
21	CCS	Component Cooling Outside Cont				X
22	CCS	From Component Cooling Water System to Evaporators				X
23	CCS	Evaporators to Component Cooling Water Sys				X
24	CCS	Evaporators to Component Cooling Water Sys				X
25	CCS	Component Cooling Water Outside Cont - Pump Discharge				X
26	CCS	Component Cooling Water Outside Cont - Pump Discharge				X
27	CCS	Component Cooling Water Outside Cont - Pump Discharge				X
28	CCS	Component Cooling Water Outside Cont - Pump Discharge				X
29	CVC	Primary Coolant Pump Leak Off to Volume Control Tank - 602' Pipeway	X			X
30	CVC	Letdown to Volume Control Tank - 602' Pipeway	X			X
31	LSS	GC-8 Shutdown Cooling Lower Pressure Safety Injection Pump Suction				X
32	LSS	HC-3 Engineering Safeguards Pump Suction				X
33	LSS	GC-8 Shutdown Cooling LPSI Pump Suction				X
34	LSS	HC-3 Engineering Safeguards Pump Suction				X
35	LSS	GC-1 LPSI Pump Discharge				X
36	LSS	GC-1 LPSI Pump Discharge				X
37	LSS	GC-1 LPSI Pump Discharge				X
38	LSS	GC-1 LPSI Pump Discharge				X

*Modifications to this table due to changes in high radiation areas should be submitted to the NRC as part of the next license amendment.

TABLE 3.20.2 (Cont'd)

Palisades ID Number	System	Location	Snubber in High Radiation Area During Shutdown*	Snubbers Especially Difficult To Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
39	ESS	GC-8 Shutdown Cooling LPSI Pump Suction				X
40	ESS	GC-8 Shutdown Cooling LPSI Pump Suction				X
41	ESS	GC-8 Shutdown Cooling LPSI Pump Suction				X
42	ESS	GC-1 LPSI Pump Discharge				X
43	ESS	HC-3 Engineering Safeguards Pump Suction				X
44	ESS	GC-1 LPSI Pump Discharge (After CV-3025 SDHX to LPSI Valves				X
45	ESS	HC-3 Engineering Safeguards Pump Suction				X
46	MSS	Steam Generator A, Restraint 1-SS-1	X	X	X	
47	MSS	Steam Generator A, Restraint 1-SS-2	X	X	X	
48	MSS	Steam Generator A, Restraint 1-SS-3	X	X	X	
49	MSS	Steam Generator A, Restraint 1-SS-4	X	X	X	
50	MSS	Steam Generator A, Restraint 1-SS-5	X	X	X	
51	MSS	Steam Generator A, Restraint 1-SS-6	X	X	X	
52	MSS	Steam Generator A, Restraint 1-SS-7	X	X	X	
53	MSS	Steam Generator A, Restraint 1-SS-8	X	X	X	
54	MSS	Steam Generator B, Restraint 2-SS-1	X	X	X	
55	MSS	Steam Generator B, Restraint 2-SS-2	X	X	X	
56	MSS	Steam Generator B, Restraint 2-SS-3	X	X	X	
57	MSS	Steam Generator B, Restraint 2-SS-4	X	X	X	
58	MSS	Steam Generator B, Restraint 2-SS-5	X	X	X	
59	MSS	Steam Generator B, Restraint 2-SS-6	X	X	X	
60	MSS	Steam Generator B, Restraint 2-SS-7	X	X	X	
61	MSS	Steam Generator B, Restraint 2-SS-8	X	X	X	
62	SIS	On Low-Pressure Safety Injection Line Inside Cont Before Motor-Operated Valves			X	
63	SIS	Low-Pressure Safety Injection to 1-82C			X	
64	SIS	Low-Pressure Safety Injection to 1-82C			X	
65	MSS	On LBD-7 Steam to Aux feed Pump				X

*Modifications to this table due to changes in high radiation areas should be submitted to the NRC as part of the next license amendment.

TABLE 3.20.2
Safety-Related Mechanical Shock Suppressors (Snubbers)

Palisades ID Number	System	Location	Snubber In High Radiation Area During Shutdown*	Snubbers Especially Difficult To Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
66	FWS	FWS Elev 642, Steam Generator A	X	X	X	
67	FWS	FWS Elev 642, Steam Generator B	X	X	X	
68	SIS	CC-4 From Safety Injection Tank 82B	X	X	X	
69	SIS	CC-4 From Safety Injection Tank 82B	X		X	
70	SIS	CC-4 From Safety Injection Tank 82B	X		X	
71	SIS	CC-4 From Safety Injection Tank 82B	X		X	
72	SIS	CC-1 From Safety Injection Tank 82A	X		X	

*Modifications to this table due to changes in high radiation areas should be submitted to the NRC as part of the next license amendment.

4.16 Inservice Inspection Program for Shock Suppressors (Snubbers)

Applicability

Applies to periodic surveillance of safety-related snubbers as listed in Tables 3.20.1 and 3.20.2.

Specification

4.16.1 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.

a. Visual Inspection

Visual inspection shall be performed in accordance with the following schedule:

No Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY and (2) attachments to the foundation or supporting structure are secure. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specifications 4.16.1.d or 4.16.1.e, as applicable. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample (10% of the total safety-related snubbers in use at the plant) shall be functionally tested either in place or in a bench test. The test shall verify the snubber has freedom of movement and is not frozen up. For each snubber which did not meet the functional test acceptance criteria of Specification 4.16.1.d or 4.16.1.e, an additional 10% of the total shall be functionally tested.**

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. Snubbers identified in Table 3.20.1 and 3.20.2 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample. * Table 3.20.1 and 3.20.2 may be used jointly or separately as the basis for the sampling plan.

*Permanent or other exemptions from functional testing for individual snubbers may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

**Functional tests for snubbers of rated capacity greater than 50,000 pounds will not be performed until such time that suitable on-site testing equipment is available. In the interim, a stroke test will be performed to verify freedom of movement over the full range of stroke in both compression and tension.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the resampling.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are suppressed by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components suppressed by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the suppressed component remains capable of meeting the designed service.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force (break away friction) which is equal to 1% of the rated load of the snubber.

2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber listed in Tables 3.20.1 and 3.20.2 shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversly affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals.

Hydraulic snubbers and mechanical snubbers may each be treated as a different entity for the above surveillance programs.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc. . .). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

e. Records of training and qualification for current members of the plant staff.

f. Records of reactor tests and experiments.

g. Records of changes made to Operating Procedures.

h. Records of radioactive shipments.

i. Records of sealed source leak tests and results.

j. Records of annual physical inventory of all source material of record.

k. Chlorine treatment records.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of monthly radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.

f. Records of inservice inspections performed pursuant to these Technical Specifications.

g. Records of Quality Assurance activities required by the QA Manual to be retained for the duration of the facility operating license.

h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

i. Records of meetings of the PRC and SARB.

j. Records of monthly facility radiation and contamination surveys.

k. Records for environmental qualification which are covered under the provisions of paragraph 6.14.

l. Records of the service lives of all hydraulic and mechanical snubbers listed on Tables 3.20.1 and 3.20.2 including the date at which the service life commences and associated installation and maintenance records.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR, Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hour but less than 1000 mrem/hour shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 69 TO PROVISIONAL OPERATING LICENSE NO. 20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By a letter dated September 2, 1981, Consumers Power Company (the licensee) proposed changes to the Technical Specifications (TSs) appended to Provisional Operating License No. DPR-20 for the Palisades Plant. The proposed changes involve revision of the Inservice Surveillance Requirements for snubbers. The licensee's request is in direct response to the NRC staff's letter dated March 23, 1981.

2.0 BACKGROUND

To reflect accumulated experience obtained from operating plants in the past several years, NRC issued Revision 1 of the Standard Technical Specifications on the surveillance requirements for safety-related snubbers. On November 20, 1980, this document was transmitted to operating plants excluding those under SEP along with a request for submittal of appropriate license amendments to incorporate the requirements of this revision within 120 days. The same request was extended to SEP plants on March 23, 1981.

Numerous discoveries of inoperative snubbers in the period of 1973 to 1975 resulted in their surveillance requirements in the Technical Specifications for operating reactor plants. However, several deficiencies were identified after the original requirements were in force for several years. These deficiencies are:

2. The rated capacity of snubbers was used as a limit to the inservice test requirement.
3. NRC approval was necessary for the acceptance of seal materials.
4. Inservice test requirements were not clearly defined.
5. In-place inservice testing was not permitted.

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3.0 EVALUATION

Since mechanical snubbers were not subject to any surveillance requirements, some licensees and permit holders believed that mechanical snubbers were preferred by NRC. Many plants used mechanical snubbers as original equipment and many others requested to replace their hydraulic snubbers with mechanical ones to simplify or avoid an inservice surveillance program. This is directly contradictory to NRC's intention, where for an unsurveyed mechanical snubber, the most likely failure is permanent lock-up. This failure mode can be harmful to the system during normal plant operations.

During the period of 1973-1975, when the first hydraulic snubber surveillance requirements in the Technical Specifications were drafted, a compromise was made to limit the testing of snubbers to those with rated capacity of not more than 50,000 lbs. This is because of the available capacity of the test equipment and the requirement to test some parameters at the snubber rated load. Since then, greater equipment capacity and better understanding of parametric correlation both developed. To maintain this arbitrary 50,000 lb. limit could mean an unnecessary compromise on plant safety.

The original hydraulic snubber problem started from leaking seals. Most seal materials of the 1973 vintage could not withstand the temperature and irradiation environments. Ethylene propylene was the first material that could offer a reasonable service life for those seals. In order to discourage the use of unproven material for those seals, the words "NRC approved material" were used in the Technical Specifications. Staff members were asked to approve different seal materials on many occasions. Consequently, since the basis for the approval was not defined, the development of better seal materials by the industry was actually discouraged.

The not-well-defined acceptance criteria in the earlier version of the testing requirements resulted in non-uniform interpretations and implementation. Acceptance Criteria were set individually at widely different ranges. Since the rationale of adopting a specific acceptance criteria was not clear, I&E inspectors found it impossible to make any necessary corrections. In some cases, snubbers were tested without reference to acceptance criteria.

Testing of snubbers was usually accomplished by removing snubbers from their installed positions, mounting them on a testing rig, conducting the test, removing them from rig, and reinstalling them to the working position. Many snubbers were damaged in the removing and reinstallation process. This defeated the purpose for conducting tests. Since methods and equipment have been developed to conduct in-place tests on snubbers, taking advantage of these developments could result in minimizing the damage to snubbers caused by removal and reinstallation plus time and cost savings to the plants.

From these short-comings it was concluded that the snubber surveillance requirements for the Technical Specifications should be revised.

The revised surveillance requirements correct these deficiencies in the following manner:

1. Mechanical snubbers are now included in the surveillance program.
2. No arbitrary snubber capacity is used as a limit to the inservice test requirements.
3. Seal material no longer requires NRC approval. A monitoring program shall be implemented to assure that snubbers are functioning within their service life.
4. Clearly defined inservice test requirements for snubbers shall be implemented.
5. In-place inservice testing shall be permitted.

The proposed license amendment submitted by Consumers Power Company for Provisional Operating License No. DPR-20 for the Palisades Plant has incorporated the necessary requirements in Revision 1 of the Standard Technical Specifications for the surveillance of safety-related snubbers and is therefore, acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

We have determined that the amendment does not authorize a change in effluent types of 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 CFR §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 the amendment.

5.0 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: March 12, 1982

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. 69 to Provisional Operating License No. DPR-20, issued to Consumers Power Company (the licensee), which revised the 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.

The amendment approves changes to the Appendix A Technical Specifications which incorporate the revised version of the Inservice Surveillance Requirements for snubbers.

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 [illegible] notice of this action is 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.

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For further details with respect to this action, see (1) the application for amendment dated September 2, 1981, (2) Amendment No. 69 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 Licensing.

Dated at Bethesda, Maryland, this 12th day of March, 1982.

FOR THE NUCLEAR REGULATORY COMMISSION

Dennis M. Crutchfield

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