



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

March 23, 1990

Docket No. 50-255
Serial No. 90-010

*See Correction letter of
4/27/90*

Mr. Kenneth W. Berry
Director, Nuclear Licensing
Consumers Power Company
1945 West Parrall Road
Jackson, Michigan 49201

Dear Mr. Berry:

SUBJECT: AMENDMENT NO. 130 TO PROVISIONAL OPERATING LICENSE NO. DPR-20:
(TAC NO. 72752)

The Commission has issued the enclosed Amendment No. 130 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 April 3, 1989. This amendment changes the Technical Specifications to incorporate the revisions of Sections 3.0 and 4.0 of the Standard Technical Specifications regarding limiting conditions for operation and surveillance requirements as described in Generic Letter 87-09. Additional revisions of an administrative, editorial, or clarification nature also are included.

By letter dated July 31, 1989, we requested additional information. Specifically, we requested that for each proposed exception to be granted under Generic Letter 87-09, you affirm that remedial measures prescribed for affected ACTION STATEMENTS are consistent with the Safety Analysis Report and that you identify and affirm those administrative controls established to limit the use of Section 3.0.4 exceptions granted. Your response (letter dated December 18, 1989) directly addressed the first issue of our request, and proposed a change to TS 6.5.1.6 to address the second issue (administrative controls to limit Section 3.0.4 exceptions). The information your letter provided does not alter the action as noticed in the Federal Register at 54 FR 37852 (September 13, 1989) nor does it otherwise affect the initial determination contained therein. The new proposed change will be noticed and acted upon separately from this amendment.

For your guidance in the application of TS 4.0.3 with regard to the 24-hour allowance for missed surveillances, another licensee raised a question about the scope of the required surveillance testing to return a system to operable status. The question had to do with systems or equipment that are administratively declared inoperable because a component has failed or a support system is inoperable or removed from service for surveillance testing or preventive maintenance. One example given was the failure or removal from service of a cooling water regulating valve to an emergency diesel generator. Another was failure or removal from service of a room cooler for a room containing safety-related equipment. In many cases, the system or component removed from service or otherwise inoperable does not result in degradation of other equipment or invalidation of the previous surveillance test results for the affected safety-related equipment that was administratively declared inoperable. In this situation, the only surveillance testing required is for the failed component or

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support system. This is most likely the situation where a support system is taken out of service to perform a missed surveillance test. For the case of a failed component or support system, post-maintenance testing of the component or support system could suffice. An evaluation should be made in each case to determine that the failed (out-of-service) component or support system has not impacted the capability of the safety-related system to perform as intended after the component or support system has been returned to service. Otherwise, the impacted system must be tested.

A copy of our related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

John O. Thoma for

Albert W. De Agazio, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 130 to
License No. DPR-20
2. Safety Evaluation

cc w/enclosures:

See next page

Mr. Kenneth W. Berry
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Palisades Plant

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support system. This is most likely the situation where a support system is taken out of service to perform a missed surveillance test. For the case of a failed component or support system, post-maintenance testing of the component or support system could suffice. An evaluation should be made in each case to determine that the failed (out-of-service) component or support system has not impacted the capability of the safety-related system to perform as intended after the component or support system has been returned to service. Otherwise, the impacted system must be tested.

A copy of our related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by

Albert W. De Agazio, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

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A copy of our related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Albert W. De Agazio, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 130
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 April 3, 1989, 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:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 130, 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 and shall be implemented not later than May 7, 1990.

FOR THE NUCLEAR REGULATORY COMMISSION



John O. Thoma, Acting Director
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Charges to the Technical
Specifications

Date of Issuance: March 23, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 130
PROVISIONAL OPERATING LICENSE NO. DPR-20
DOCKET NO. 50-255

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

<u>REMOVE</u>	<u>INSERT</u>
3-1	3-1
-	3-1a
-	3-1aa
-	3-1ab
3-78	3-78
4-1	4-1
-	4-1a
-	4-1b
-	4-1c
-	4-1d
-	4-1e
4-3	4-3
4-4	4-4
4-5	4-5
4-6	4-6
4-8	4-8
4-9	4-9
4-16	4-16
4-17	4-17
4-18	4-18

LIMITING CONDITIONS FOR OPERATION

3.0 APPLICABILITY

LIMITING CONDITIONS FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the plant conditions or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated action requirements shall be met.

3.0.2 Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated action requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the action requirements is not required.

3.0.3 When a Limiting Condition for Operation and/or associated action requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, within one hour action shall be initiated to place the unit in a condition in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the action requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

3.0.4 Entry into a reactor operating condition or other specified condition shall not be made when the conditions for the Limiting Conditions for Operation are not met and the associated action requires a shutdown if they are not met within a specified time interval. Entry into a reactor operating condition or other specified condition may be made in accordance with action requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to reactor operating conditions as required to comply with action requirements. Exceptions to these requirements are stated in the individual specifications. /
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3.0 BASIS

LIMITING CONDITIONS FOR OPERATION

Specification 3.0.1 through 3.0.4 establish the general requirements applicable to Limiting Conditions for Operation. These requirements are based on the requirements for Limiting Conditions for Operation stated in the Code of Federal Regulations, 10 CFR 50.36(c)(2):

"Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met."

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which plant condition or other specified conditions) conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The action requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met.

There are two basic types of action requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the action requirements. In this case, conformance to the action requirements provides an acceptable level of safety for unlimited continued operation as long as the action requirements continue to be met. The second type of action requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in a plant condition in which the specification no longer applies. It is not intended that the shutdown action requirements be used as an operational convenience which permits (routine) voluntary removal of a system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

The specified time limits of the action requirements are applicable from the point in time it is identified that a Limiting Condition for Operation is not met. The time limits of the action requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems. Individual specifications may include a specified time limit for the completion of a Surveillance Requirement when equipment is removed from service. In this case, the allowable outage time limits of the action requirements are applicable when this time limit expires if the surveillance has not been completed. When a shutdown is required to comply with action requirements, the plant may have entered a plant condition in which a new specification becomes applicable. In this case, the time limits of the action requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

LIMITING CONDITIONS FOR OPERATION

Specification 3.0.2 establishes that noncompliance with a specification exists when the requirements of the Limiting Condition for Operation are not met and the associated action requirements have not been implemented within the specified time interval. The purpose of this specification is to clarify that (1) implementation of the action requirements within the specified interval constitutes compliance with a specification and (2) completion of the remedial measures of the action requirements is not required when compliance with a Limiting Condition for Operation is restored within the time interval specified in the associated action requirements.

Specification 3.0.3 establishes the shutdown action requirements that must be implemented when a Limiting Condition for Operation is not met and the condition is not specifically addressed by the associated action requirements. The purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown condition when the plant operation cannot be maintained within the limits for safe operation defined by the Limiting Conditions for Operation and its action requirements. It is not intended to be used as an operational convenience which permits (routine) voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. One hour is allowed to prepare for an orderly shutdown before initiating a change in plant operation. This time permits the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower plant conditions of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the cooldown capabilities of the facility assuming only the minimum required equipment is operable. This reduces thermal stress on components of the primary coolant system and the potential for a plant upset that could challenge safety systems under conditions for which this specification applies.

If remedial measures permitting limited continued operation of the facility under the provisions of the action requirements are completed, the shutdown may be terminated. The time limits of the action requirements are applicable from the point in time there was a failure to meet a Limiting Condition for Operation. Therefore, the shutdown may be terminated if the action requirements have been met or the time limits of the action requirements have not expired, thus providing an allowance for the completion of the required actions.

The time limits of Specification 3.0.3 allow 37 hours for the plant to be in cold shutdown when a shutdown is required during power operation. If the plant is in a lower operation condition when a shutdown is required, the time limit for reaching the next lower condition of operation applies. However, if a lower operating condition is reached in less time than allowed, the total allowable time to reach cold shutdown, or other

LIMITING CONDITIONS FOR OPERATION

applicable condition, is not reduced. For example, if hot standby is reached in 2 hours, the time allowed to reach hot shutdown is the next 11 hours because the total time to reach hot shutdown is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to power operation, a penalty is not incurred by having to reach a lower plant operating condition in less than the total time allowed.

The same principle applies with regard to the allowable outage time limits of the action requirements, if compliance with the action requirements for one specification results in entry into a condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of action requirements for a higher reactor operating condition of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower plant condition of operation.

The shutdown requirements of Specification 3.0.3 do not apply during cold shutdown and refueling because the action requirements of individual specifications define the remedial measures to be taken.

Table 3.17.1
Instrumentation Operating Requirements for Reactor Protective System

<u>No.</u>	<u>Functional Unit</u>	<u>Minimum Operable Channels</u>	<u>Minimum Degree of Redundancy</u>	<u>Permissible Bypass Conditions</u>	
1.	Manual (Trip Buttons) (g)	1	None	None	/
2.	Variable High Power Level (g)	2 ^(b,d)	1 ^(d)	None	/
3.	Log Range Channels (g)	2	1	Below $10^{-4}\%$ ^(e) or Above 15% Rated Power ^(a) Except as Noted in (c)	/
4.	Thermal Margin/Low-Pressurizer Pressure (g)	2 ^(b,f)	1	Below $10^{-4}\%$ ^(e) of Rated Power ^(a) and greater than cold shutdown boron concentration.	/
5.	High-Pressurizer Pressure (g)	2 ^(b)	1	None	/
6.	Low Flow Loop (g)	2 ^(b)	1	Below $10^{-4}\%$ ^(e) of Rated Power ^(a) and greater than cold shutdown boron concentration.	/
7.	Loss of Load (h)	1	None	None	/
8.	Low Steam Generator Water Level (g)	2/Steam Gen ^(b)	1/Steam Generator	None	/
9.	Low Steam Generator Pressure (g)	2/Steam Gen ^(b)	1/Steam Generator	Below $10^{-4}\%$ ^(e) of Rated Power ^(a) and greater than cold shutdown boron concentration.	/
10.	High Containment Pressure (g)	2 ^(b)	1	None	/

- (a) Bypass automatically removed.
- (b) One of the inoperable channels must be in the tripped condition.
- (c) Two channels required if TM/LP, low steam generator or low-flow channels are bypassed.
- (d) If only two channels are operable, load shall be reduced to 70% or less of rated power.
- (e) For low power physics testing, $10^{-4}\%$ may be increased to $10^{-1}\%$ and cold shutdown boron concentration is not required.
- (f) Axial Offset operability requirements are given in Specification 3.11.2.
- (g) Required operable if any clutch power supply is energized.
- (h) Automatically bypassed below 15% power.

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.
- 4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The action requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment. /
/
- 4.0.4 Entry into a reactor operating condition or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition of Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to plant conditions as required to comply with action requirements. /
/
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows: /
/
 - a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). /
/

SURVEILLANCE REQUIREMENT (Continued)

- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:
- | <u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u> | <u>Required frequencies for performing inservice inspection and testing activities</u> | |
|--|--|---|
| Weekly | At least once per 7 days | / |
| Monthly | At least once per 31 days | / |
| Quarterly or every 3 months | At least once per 92 days | / |
| Semiannually or every 6 months | At least once per 184 days | / |
| Every 9 months | At least once per 276 days | / |
| Yearly or annually | At least once per 366 days | / |
- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities. /
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements. /
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification. /

Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance requirements stated in the code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during reactor operating conditions or other conditions for which the requirements of the Limiting Conditions for Operation apply, unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a reactor operating condition or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an operational condition for which the requirements of the associated Limiting Condition for Operation do not apply, unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception the the requirements of a specification.

Specification 4.0.2 establishes the conditions under which the specified time interval for Surveillance Requirements may be extended. Item a. permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. Item b. limits the use of the provisions of item a. to ensure that it is not used repeatedly to extend the surveillance interval beyond that specified. The limits of Specification 4.0.2 are based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. These provisions are sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the operability requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be operable when Surveillance Requirements have

been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are operable when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the action requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the action requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the action requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the operability requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specifications 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the action requirements are less than 24 hours or a shutdown is required to comply with action requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing action requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with action requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of plant condition changes imposed by action requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the action requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the action requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the action requirements define the remedial measures that apply. However, following expiration of the surveillance interval, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to operable status.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into a reactor operating condition or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component operability requirements or parameter limits are met before entry into an operational condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in reactor operating conditions or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with action requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower operational condition.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply, except when relief has been provided in writing by the Commission.

This specification includes clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into a reactor operating condition or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of operable does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

Applicability

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

Objective

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 4.1.1 and in Tables 4.1.1 to 4.1.3.

4.1.1 Overpressure Protection Systems

- a. Each PROV shall be demonstrated operable by:
1. 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 operable and at least once per 31 days thereafter when the PORV is required operable.
 2. Performance of a channel calibration on the PORV actuation channel at least once per 18 months.
 3. Verifying the PORV isolation valve is open at least once per 72 hours when the PORV is being used for overpressure protection.
 4. Testing in accordance with the inservice inspection requirements for ASME Section XI, Section IWV Category C valves.

TABLE 4.1.1

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

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
1. Power Range Safety Channels	a. Check (7)	S	a. Comparison of four-power channel readings.
	b. Check(3)	D	b. Channel adjustment to agree with heat balance calculation. Repeat whenever flux- ΔT power comparators alarms.
	c. Test	M(2)	c. Internal test signal.
	d. Calibrate (6)	R	d. Channel alignment through measurement/adjustment of internal test points.
2. Wide-Range Logarithmic Neutron Monitors	a. Check	S	a. Comparison of both wide-range readings.
	b. Test	P	b. Internal test signal.
3. Reactor Coolant Flow	a. Check	S	a. Comparison of four separate total flow indications.
	b. Calibrate	R	b. Known differential pressure applied to sensors.
	c. Test	M(2)	c. Bistable trip tester.(1)(4)
4. Thermal Margin/Low Pressurizer Pressure	a. Check: (8)	S	a. Check:
	(1) Temperature Input		(1) Comparison of four separate calculated trip pressure set point indications.
	(2) Pressure Input		(2) Comparison of four pressurizer pressure indications. Same as 5(a) below.)
	b. Calibrate	R	b. Calibrate:
	(1) Temperature Input		(1) Known resistance substituted for RTD coincident with known pressure and power input.
	(2) Pressure Input		(2) Part of 5(b) below.
c. Test	M(2)	c. Bistable trip tester.(1)	
5. High-Pressurizer Pressure	a. Check (8)	S	a. Comparison of four separate pressure indications.
	b. Calibrate	R	b. Known pressure applied to sensors.
	c. Test	M(2)	c. Bistable trip tester.(1)

TABLE 4.1.1

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

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
6. Steam Generator Level	a. Check	S	a. Comparison of four level indications per generator. b. Known differential pressure applied to sensors. c. Bistable trip tester.(1)
	b. Calibrate	R	
	c. Test	M(2)	
7. Steam Generator Pressure	a. Check	S	a. Comparisons of four pressure indications per generator. b. Known pressure applied to sensors. c. Bistable trip tester.(1)
	b. Calibrate	R	
	c. Test	M(2)	
8. Containment Pressure	a. Calibrate	R	a. Known pressure applied to sensors. b. Simulate pressure switch action.
	b. Test	M(2)	
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	M(2)	a. Internal test circuits.
12. Axial Shape Index (ASI)	a. Test	R	a. Known power inputs applied to Thermal Margin Calculator.
13. ΔT Power	a. Check (7)	S	a. Same as 1(a). b. Same as 1(b). c. Known temperature inputs applied to Thermal Margin Calculator.
	b. Check (3)	D	
	c. Test	R	

TABLE 4.1.1

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

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
14. Thermal Margin Calculator	a. Check	Q	a. Verify constants.

- 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 power or ΔT power until readout agrees with heat balance calculations when above 15% of rated power.
 - (4)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 refueling shutdown condition If this occurs, omitted testing will be performed prior to returning the plant to service.
 - (6)Also includes testing variable high power function in the Thermal Margin Calculator.
 - (7)Required if the reactor is critical.
 - (8)Required when PCS is > 1500 psia.

FREQUENCY NOTATION

<u>Notation</u>	<u>Frequency</u>
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.
P	Prior to each start-up if not done previous week.
NA	Not applicable.

TABLE 4.1.2

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

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
1. Low-Pressure SIS Initiation Channels	a. Check	S(4)	a. Comparison of four separate pressure indications.
	b. Test(1)	R	b. Signal to meter relay adjust with test device to verify SIS actuation logic.
	c. Test	M(2)	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	Q	a. Simulation of SIS 2/4 logic trip using built-in testing system. Both "standby power" and "no standby power" circuits will be tested for left and right channels. 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 Channels	a. Calibrate	R	a. Known pressure applied to sensors.
	b. Test	R	b. Simulation of CHP 2/4 logic trip to verify actuation logic for SIS, containment isolation and containment spray.
	c. Test	M(2)	c. Pressure switch operation simulated by opening or shorting terminals or pressure applied to the switch.
5. Containment High Radiation Channels	a. Check	D	a. Comparison of four separated radiation level indications.
	b. Calibrate	R	b. Exposure to known external radiation source.

TABLE 4.1.2

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

<u>Channel Description</u>	<u>Surveillance Function</u>	<u>Frequency</u>	<u>Surveillance Method</u>
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	a. 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 Circuits	a. Check	S	a. Compare four independent pressure indications.
	b. Test(3)	R	b. Signal to meter relay adjusted with test device to verify MSIV circuit logic.
17. SIRW Tank Temperature Indication and Alarms	a. Check	M	a. Compare independent temperature readouts.
	b. Calibrate	R	b. Known resistance applied to indicating loop.
18. Low-Pressure Safety Injection Flow Control Valve CV-3006	a. Check	P	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 and control power key switches.
20. Safety Injection Miniflow Valves CV-3027, 3056	a. Check	P	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.
(4)Required when PCS is > 1500 psia.

TABLE 4.1.2

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

FREQUENCY NOTATION

<u>Notation</u>	<u>Frequency</u>
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.
P	Prior to each start-up if not done previous week.
NA	Not applicable.

4.3 SYSTEMS SURVEILLANCE

APPLICABILITY

Applies to preoperational and inservice structural surveillance of the reactor vessel and other Class 1, Class 2 and Class 3 system components.

OBJECTIVE

To insure the integrity of the Class 1, Class 2 and Class 3 piping systems and components.

SPECIFICATIONS

a,b,c,d - Deleted

- e. The Inservice Inspection program shall be reevaluated as required by 10 CFR 50, Section 50.55a(g)(5) to consider incorporation of new inspection techniques that have been proven practical, and the conclusions of the evaluation shall be used as appropriate to update the inspection program.
- f. Surveillance of the regenerative heat exchanger and primary coolant pump flywheels shall be performed as indicated in Table 4.3.2.
- g. A surveillance program to monitor radiation induced changes in the mechanical and impact properties of the reactor vessel materials shall be maintained as described in Section 4.5.3 of the FSAR. The specimen removal schedule shall be as indicated in Table 4.3.3.

SYSTEMS SURVEILLANCE (Continued)

- h. Periodic leakage testing (a), (b) on each check valve listed in Table 4.3.1 shall be accomplished prior to returning to the Power Operation Condition after every time the plant has been placed in the Refueling Shutdown Condition, or the Cold Shutdown Condition for more than 72 hours if such testing has not been accomplished within the previous 9 months, and prior to returning the check valves to service after maintenance, repair or replacement work is performed on the valves. /
- i. Whenever integrity of a pressure isolation valve listed in Table 4.3.1 cannot be demonstrated and credit is being taken for compliance with Specification 3.3.3.b, the integrity of the remaining check valve in each high pressure line having a leaking valve shall be determined and recorded daily and the position of the other closed valve located in that pressure line shall be recorded daily. /
- j. Following each use of the LPSI system for shutdown cooling, the reactor shall not be made critical until the LPSI check valves (CK-3103, CK-3118, CK-3133 and CK-3148) have been verified closed.

- (a) To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria. /
- (b) Reduced pressure testing is acceptable (see footnote 5 to Table 4.3.1). Minimum test differential pressure shall not be less than 150 psid.

Basis

The inspection program specified places major emphasis on the areas of highest stress concentration as determined by general design evaluation and experience with similar systems.⁽¹⁾ In addition, that portion of the reactor vessel shell welds which will be subjected to a fast neutron dose sufficient to change ductility properties will be inspected. The inspections will rely primarily on ultrasonic methods utilizing up-to-date analyzing equipment and trained personnel. Preoperational inspections will establish base conditions by determining indications that might occur from geometrical or metallurgical sources and from discontinuities in weldments or plates which might cause undue concern on a postservice inspection. To the extent applicable, based upon the existing design and construction of the plant, the requirements of Section XI of the Code shall be complied with. Significant exceptions are detailed in the requests for relief which have received NRC approval and are contained in the Class 1, Class 2 and Class 3 Long-Term Inspection Plans.

Reactor Vessel Surveillance Specimens

Table 4.3.3 is consistent with the surveillance program as presented in the FSAR.⁽²⁾ However, the withdrawal schedule has been modified to reflect the slightly different wall fluence values resulting from removal of the thermal shield.

Valve Testing

To ensure the continued integrity of selected check valves which are relied upon to preclude a potential LOCA outside containment, special requirements for periodic leak tests are specified. In addition a valve disk position check for the LPSI check valves is specified following each use of the LPSI system for shutdown cooling. This position check ensures that the four LPSI check valves have reclosed upon cessation of shutdown cooling flow.

References

- (1) FSAR, Section 4.5.6
- (2) FSAR, Section 4.5.3
- (3) Systematic Evaluation Program Topic V-11.A, NRC letter to the licensee transmitting the final topic evaluation dated November 9, 1981.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 130 TO PROVISIONAL OPERATING LICENSE NO. DPR-20
PALISADES PLANT
DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated April 3, 1989, Consumers Power Company (CPCo), the licensee, proposed an amendment to Provisional Operating License No. DPR-20 for the Palisades Plant. The proposed amendment would change the plant Technical Specifications (TSs) based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operations (LCO) of TS 3.0 and the surveillance requirements of TS 4.0. Specifically, the licensee has requested the following revisions to the plant TS by adding Sections 3.0.4, 4.0.3, 4.0.4 and 4.0.5 as follows:

Specification 3.0.4 is revised to define when its provisions apply; i.e., when the affected action statements permit continued operation for an unlimited time period, vice defining when the provisions do not apply.

Specification 4.0.3 is added to incorporate a 24-hour delay in implementing action requirements due to a missed surveillance when the action requirements provide a restoration time that is less than 24 hours.

Specification 4.0.4 is added to clarify that this provision shall not prevent passage through or to plant conditions as required to comply with action requirements.

Specification 4.0.5 is added to provide conformance of the Palisades Plant Technical Specifications to the Standard Technical Specifications and to clarify the definition of the frequencies of required surveillance tests. This new specification includes requirements previously addressed in Specification 4.3 and adds appropriate requirements for inservice testing of valves. The portions of Specification 4.3 superseded by Specification 4.0.5 are deleted.

TS Table 3.17.1, 4.1.1, and 4.1.2 are revised to identify operational conditions during which certain reactor protection system instrumentation is required to be operable, and when associated instrument checks are required. These changes are needed to assure consistency with the proposed revision to Section 4.0.

CPCo has also requested several additional changes as follows:

- (1) add note (g) to Items 1 to 6 and 8 to 10 of Table 3.17.1
"(g) Required operable if any clutch power supply is energized."
- (2) add note (h) to Item 7 of Table 3.17.1
"(h) Automatically bypassed below 15% power."

- (3) add note (7) to Items 1.a. and 13.a of Table 4.1.1. and add note at end of Table
"(7) Required if the reactor is critical."
- (4) add note (8) to Items 4.a and 5.a of Table 4.1.1. and add note at end of Table.
"(8) Required when PCS is _ 1500 psia."
- (5) Delete note 4 for Items 1b and 2a of Table 4.1.2, and add new note (4) for Item 1a (channel check, shift surveillance). Add note at end of Table.
"(4) Required when PCS is _ 1500 psia."
- (6) Revise Specification 4.3 as follows:

Delete Items a, b, c, and d. Remove asterisk from Items h and i and remove asterisk footnote.

2.0 EVALUATION

Specification 3.0.4

GL 87-09 recognizes, in part, that Specification 3.0.4 unduly restricts facility operation when conformance to the action requirements provides an acceptable level of safety for continued operation in any operational condition. For an LCO that has action requirements permitting continued operation for an unlimited period of time, entry into an operational condition or other specified condition of operation should be permitted in accordance with those action requirements. The restriction on change in operational condition or other specified conditions should apply only where the action requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required or where entry into that operational condition would result in entry into an action statement with such time constraints. However, nothing in the staff position stated in GL 87-09 should be interpreted as endorsing or encouraging plant startup with inoperable equipment. The GL 87-09 itself states that startup with inoperable equipment should be the exception rather than the rule.

CPCo has indicated assurance that the remedial measures prescribed by the action requirements for each change involving TS 3.0.4 is consistent with the plant licensing basis. Further, CPCo has proposed an additional TS change to define a new Plant Review Committee (PRC) responsibility. The proposed change, submitted to the NRC by letter dated December 18, 1989, would require that all exceptions to TS 3.0.4 be reviewed by the PRC prior to changing plant operating conditions. The PRC review would provide assurance that the exception to TS 3.0.4 would not create an unreviewed safety question nor create a safety hazard. The staff will review this proposed TS change apart from the changes proposed by the April 3, 1989, application.

CPCo has not proposed any associated changes that affect plant configuration, setpoints, operating parameters, or operator-equipment interface.

The staff finds acceptable the proposed revision to TS 3.0.4.

Specification 4.0.3

In GL 87-09, the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components in fact are operable. Because the allowable outage time limits of some action requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply, the TS should include a time limit that would allow a delay of the required action to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, unavailability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the action requirements are less than this time limit or when shutdown action requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenges to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed.

This limit does not waive compliance with Specification 4.0.3. Under Specification 4.0.3, the failure to perform a surveillance requirement will continue to constitute noncompliance with the operability requirements of an LCO and to bring into play the applicable action requirements.

Based on the above, the staff finds acceptable Specification 4.0.3 as proposed.

Specification 4.0.4

TS 4.0.4 prohibits entry into a reactor operating condition or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when plant operating condition changes are required in order to comply with action requirements. Specifically, two possible conflicts between TSs 4.0.3 and 4.0.4 could exist. The first conflict arises because TS 4.0.4 prohibits entry into an operational condition or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. The resolution to this conflict involves a clarification to TS 4.0.3 to permit a delay of up to 24 hours in the application of the action requirements, as explained above, and a statement in TS 4.0.4 to allow passage through or to operational conditions as required to comply with action requirements. The second potential conflict between TSs 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when surveillance requirements can only be completed after entry into an operational condition. However, after entry into this condition, the requirements of TS 4.0.3 may not be met because the surveillance requirements may not have been performed within the allowable surveillance interval.

CPCo proposes to resolve these conflicts by adding TS 4.0.4 which would specify that (1) entry into a reactor operating condition or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition of Operation has been performed within the stated surveillance interval or as otherwise specified, and (2) that this provision shall not prevent passage through or to plant conditions as required to comply with action requirements.

In GL 87-09 the staff has clarified that: (a) it is not the intent of 4.0.3 that the action requirements preclude the performance of surveillances allowed under any exception to TS 4.0.4; and (b) that the delay of up to 24 hours in TS 4.0.3 for the applicability of action requirements provides an appropriate time limit for the completion of surveillance requirements that become applicable as consequence of any exception to TS 4.0.4. Therefore, the staff finds the proposed TS 4.0.4 acceptable.

Specification 4.0.5

Proposed TS 4.0.5 would establish the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements would apply, except when relief has been provided in writing by the Commission.

This proposed specification includes clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is proposed to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into a reactor operating condition or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of operable does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

The staff finds Specification 4.0.5 acceptable.

Miscellaneous Changes

CPCo has proposed several changes which are of an editorial nature, or for the purpose of clarification, or to remove unnecessary requirements. The proposed changes and our evaluation follow.

1. A footnote indicating that the operability requirement is applicable when any clutch power supply is energized is proposed to be added to Table 3.17.1. The footnote would relate to all items of the Reactor Protection System (RPS) identified in the table except Item 7, Loss of Load.

Evaluation

This proposed change would add applicability requirements where previously none existed to define when equipment is allowed to be out of service. The addition of the footnote would add a condition when the equipment could be inoperable similar to that which is allowed in the Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors, NUREG-0212 (Rev 2). The staff finds this proposed addition acceptable.

2. A footnote indicating that Item 7, Loss of Load, is automatically bypassed below 15% power is proposed to be added to Table 3.17.1.

Evaluation

The automatic bypass always has been a design feature of the RPS. Therefore, this change is acceptable.

3. A footnote indicating that the surveillance requirement is applicable when the reactor is critical is proposed to be added to Table 4.1.1. The footnote would relate to items 1.a and 13.a (Power Range Safety Channels surveillance checks, and Delta T Power channels surveillance checks).

Evaluation

The addition of this footnote would add a condition when the equipment surveillance would not be required which is similar to that which is allowed in the Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors, NUREG-0212 (Rev 2). The staff finds this proposed addition acceptable.

4. A footnote indicating that the surveillance requirement is applicable when the Primary Coolant System pressure is greater than 1500 psia is proposed to be added to Table 4.1.1, Item 4.a (Thermal Margin/Low Pressurizer Pressure check) and Item 5.a (High Pressurizer Pressure check) and Table 4.1.2, Item 1.a (Low Pressure SIS Initiation). The footnote added to Table 4.1.2 replaces existing Footnote (4) which no longer has significance since it referred to a 1981 refueling outage surveillance deferral.

Evaluation

The lower range of the pressurizer pressure instrumentation is 1500 psia, therefore, the staff finds these proposed changes acceptable.

5. Proposed revisions to TS 4.3 would delete Specification 4.3.a through 4.3.d, and would delete asterisks from Specifications 4.3.h and 4.3.i and the associated footnote.

Evaluation

New TS 4.0.5 would cover the existing requirements of TS 4.3.a through 4.3.d, and the footnote to TSs 4.3.h and 4.3.i relates to the 1981 refueling outage and is no longer of significance. Therefore, the staff finds that with the incorporation of proposed TS 4.0.5, the proposed deletions are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes to 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 and changes to the surveillance requirements. The staff has determined that these amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment of such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The staff has concluded, based on the consideration 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 these amendments will not be inimical to the common defense and security nor the the health and safety of the public.

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Dated: March 23, 1990