Mr. Gerald B. Slade Plant General Manager Palisades Plant Consumers Power Company 27780 Blue Star Memorial Highway Covert, Michigan 49043

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - AMENDMENT NO. 148 TO FACILITY OPERATING LICENSE NO. DPR-20 (TAC NO. M80554)

The Commission has issued the enclosed Amendment No.148 to Facility Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your application dated June 13, 1991.

This amendment modifies the Palisades Plant Technical Specifications, Section 4.16.1, in response to NRC Generic Letter 90-09, "Alternate Requirements For Snubber Visual Inspection Intervals and Corrective Actions," which provides an alternate schedule for visual inspection of snubbers.

The NRC staff has completed its review of your request dated June 13, 1991. Generic Letter 90-09 contained a provision that stated the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the program in effect at the time of this amendment. This provision was not explicitly stated in your amendment request, however, discussions with your licensing staff on February 14, 1992. confirmed that the first inspection interval will be based upon the inspection interval in effect at the time of this amendment.

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

Sincerely.

Original signed by

Armando Masciantonio, Project Manager Project Directorate III-1 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 148 DPR-20

Safety Evaluation

NC FIE OFFICE CONV

cc w/enclosures: See next page

	to page			
OFFICE	LA:PD31	PM: PD31 asm	OGC NLO	D:PD31 /
NAME	MShuttleworth	AMasciantonio: jkd	MZOBLER,	L Marsh W
DATE	5 129/92	6/2/92	6/3/92	le /12/92

OFFICIAL RECORD COPY

= ONP FILENAME: C:\WP\WPDOCS\PALISADE\M80554.AME correction MINOr

DATED: June 12, 1992

AMENDMENT NO. 148 TO FACILITY OPERATING LICENSE NO. DPR-20-PALISADES

Docket File NRC & Local PDRs PDIII-1 Reading Palisades Plant File B. Boger J. Zwolinski L. Marsh M. Shuttleworth A. Masciantonio M. Gamberoni

D. Hagan, 3302 MNBB G. Hill (4), P-137 Wanda Jones, MNBB-7103 C. Grimes, 11/F/23

J. Hiller ACRS (10) GPA/PÀ OC/LFMB

W. Shafer, R-III

cc: Plant Service list

230042

0208400

Mr. Gerald B. Slade Consumers Power Company

cc:

M. I. Miller, Esquire Sidley & Austin 54th Floor One First National Plaza Chicago, Illinois 60603

Mr. Thomas A. McNish, Secretary Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49201

Judd L. Bacon, Esquire Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49201

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

Jerry Sarno Township Supervisor Covert Township 36197 M-140 Highway Covert, Michigan 49043

Office of the Governor Room 1 - Capitol Building Lansing, Michigan 48913

Mr. Patrick M. Donnely, Director Safety and Licensing Palisades Plant 27780 Blue Star Memorial Highway Covert, Michigan 49043

U.S. Nuclear Regulatory Commission Resident Inspector Office Palisades Plant 27782 Blue Star Memorial Highway Covert, Michigan 49043

Palisades Plant

Nuclear Facilities and Environmental Monitoring Section Office Division of Radiological Health Department of Public Health 3423 N. Logan Street P. O. Box 30195 Lansing, Michigan 48909

Gerald Charnoff, Esquire Shaw, Pittman, Potts and Trowbridge 2300 N Street, N. W. Washington DC 20037

Mr. David L. Brannen, Vice President Palisades Generating Company c/o Bechtel Power Corporation 15740 Shady Grove Road Gaithersburg, Maryland 20877

Roy W. Jones, Manager Strategic Program Development Westinghouse Electric Corporation 4350 Northern Pike Monroeville, Pennsylvania 15146



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

CONSUMERS POWER COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 148 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) by letter dated June 13, 1991, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 148, 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 its date of issuance, and shall be implemented no later than 30 days from date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

L. B. Marsh, Director

Project Directorate III-1

Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: June 12, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 148 FACILITY 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 amendment number and contain marginal lines indicating the area of change.

REMOVE	<u>INSERT</u>
4-71	4-71 4-71a
	4-/1d

4.16 Inservice Inspection Program for Shock Suppressors (Snubbers)

<u>Applicability</u>

Applies to periodic surveillance of safety-related snubbers as described per Specification 3.20.

<u>Specifications</u>

4.16.1 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program in addition to the requirements of Specification 4.0.5. As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

a. <u>Visual Inspection</u>

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the following paragraph:

If one or more unacceptable snubbers are found, the next inspection interval shall be 2/3 (-25%) of the previous interval. If no unacceptable snubbers are found, the next interval may be doubled (-25%), but not to exceed 48 months. The interval extension provisions of Technical Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

Inspections performed before the 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.

b. <u>Visual Inspection Acceptance Criteria</u>

Visual inspection shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for

4.16.1 <u>Specifications</u> (continued)

that particular snubber and for other snubbers, irrespective of type, that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Technical Specification 4.16.1d or 4.16.1e, as applicable. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the action requirements shall be met.

^{1,2}Notes 1 and 2 have been deleted.



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 148 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated June 13, 1991, Consumers Power Company (the licensee) requested amendment to the Technical Specifications (TS) appended to Facility Operating License No. DPR-20 for the Palisades Plant. The proposed amendment revises Technical Specification, Sections 4.16.1a and 4.16.1b in response to Generic Letter 90-09, "Alternate Requirements For Snubber Visual Inspection Intervals and Corrective Actions," which provided an alternate schedule for visual inspections for snubbers. The sections were revised per the guidance provided in Generic Letter 90-09.

2.0 EVALUATION

The current TS schedule for snubber visual inspection is based on the number of inoperable snubbers found during the previous visual inspection. Because the current schedule is based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive. Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements.

To alleviate this situation, the staff developed an alternate schedule for visual inspection in Generic Letter 90-09 that maintains the same confidence level as the existing schedule and generally will allow the snubber visual inspections and corrective actions to be performed during plant outages. In addition, the implementation of the proposed alternative schedule will allow for less frequent snubber inspections, provided the results of ongoing inspections are favorable. The alternate inspection schedule is based on the number of unacceptable snubbers found during the previous inspection, the total snubber category size, and the previous inspection interval.

Because this line-item TS improvement will reduce future occupational radiation exposure and is highly cost-effective, the alternate inspection schedule is consistent with the Commision's policy statement on TS improvements.

Licensee's request dated June 13, 1991, did not address a provision of the generic letter that stated the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the program in effect at the time of this amendment. Discussions with licensee's licensing staff on February 14, 1992, confirmed that the first inspection interval will be based upon the inspection interval in effect at the time of this amendment.

The proposed changes to the Palisades TS are being implemented in response to GL 90-09 and are consistent with the guidance in GL 90-09. We, therefore, find the changes to TS Sections 4.16.1a and 4.16.1b acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and a change in a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (56 FR 41578). 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.

5.0 CONCLUSION

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

Principal Contributor: J. Heller

Date: June 12, 1992