

April 8, 1998

Mr. Nathan L. Haskell
Director, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: CONTAINMENT SYSTEMS TECHNICAL SPECIFICATIONS (TAC NO. M98291)

Dear Mr. Haskell:

The Commission has issued the enclosed Amendment No. 179 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TS) in partial response to Consumers Energy Company's application dated March 26, 1997.

The amendment revises the Containment Systems TS to incorporate a note to allow opening an operable airlock door to perform repairs on inoperable airlock components when the other airlock door is inoperable. The Consumers Energy request also proposed revising the requirements contained in TS sections 3.6 and 4.5 to closely emulate the format and content of NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants"; that portion of the Consumers Energy request remains under staff review and will be addressed in separate correspondence.

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

Sincerely,
ORIGINAL SIGNED BY

Robert G. Schaaf, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures: 1. Amendment No. 179 to DPR-20
2. Safety Evaluation

cc w/encl: See next page

DISTRIBUTION: See attached page * SEE PREVIOUS CONCURRENCE

DOCUMENT NAME: G:\WPDOCS\PALISADE\PAL98291.AMD

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	PM:PD31	E	LA:PD31	E	*BC:SCSB	E	*OGC	D:PD31
NAME	RGSchaaf:db <i>WAL</i>		CJamerson <i>J</i>		RLabel for CBerlinger		STurk	CACarpenter <i>JK</i>
DATE	4/8/98		4/8/98		4/8/98		4/8/98	4/8/98

OFFICIAL RECORD COPY

V/1
DF01

9804140486 980408
PDR ADOCK 05000255
P PDR

ARC FILE CONTROL COPY

Mr. Nathan L. Haskell
Consumers Energy Company

Palisades Plant

cc:

Mr. Thomas J. Palmisano
Site Vice President
Palisades Plant
27780 Blue Star Memorial Highway
Covert, Michigan 49043

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

Mr. Robert A. Fenech, Sr Vice Pres
Nuclear, Fossil, and Hydro Operations
Consumers Energy Company
212 West Michigan Avenue
Jackson, Michigan 49201

Drinking Water and Radiological
Protection Division
Michigan Department of
Environmental Quality
3423 N. Martin Luther King Jr Blvd
P. O. Box 30630 CPH Mailroom
Lansing, Michigan 48909-8130

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

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

Mr. Thomas A. McNish
Vice President & Secretary
Consumers Energy Company

Michigan Department of Attorney
General
Special Litigation Division
630 Law Building
P.O. Box 30212
Lansing, Michigan 48909

212 West Michigan Avenue
Jackson, Michigan 49201

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

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

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

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

March 1998

DATED: April 8, 1998

AMENDMENT NO. 179 TO FACILITY OPERATING LICENSE NO. DPR-20 - PALISADES

Docket File (50-255)

PUBLIC

PDIII-1 Reading

E. Adensam (EGA1)

C. Jamerson

R. Schaaf

OGC

G. Hill (2)

W. Beckner

ACRS

B. Burgess, RIII

SEDB (TLH3)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 179
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Energy Company (the licensee) dated March 26, 1997, 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:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 179, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. Consumers Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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

FOR THE NUCLEAR REGULATORY COMMISSION



Robert G. Schaaf, Project Manager
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: April 8, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 179

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 amendment number and contain vertical lines indicating the areas of change.

REMOVE

3-40
4-20

INSERT

3-40
4-20

3.6 CONTAINMENT SYSTEM

Applicability

Applies to the reactor containment building.

Objective

To assure the integrity of the reactor containment building.

Specifications

3.6.1 Containment Integrity*

- a. Containment integrity as defined in Specification 1.0 shall not be violated unless the reactor is in the cold shutdown condition.
- b. Containment integrity shall not be violated when the reactor vessel head is removed unless the boron concentration is greater than refueling concentration.
- c. Except for testing one rod at a time, positive reactivity changes shall not be made by CONTROL ROD motion or boron dilution unless the containment integrity is intact.

ACTION:

With one or more containment isolation valves inoperable (including during performance of valve testing), maintain at least one isolation valve operable in each affected penetration that is open and either:

- a. Restore the inoperable valves to operable status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate the affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least hot shutdown within the next 6 hours and in cold shutdown within the following 30 hours.

BASIS

The operability of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment.

* Entry and exit is permissible through a "locked" air lock door to perform repairs on other air lock components.

4.5 CONTAINMENT TESTS

4.5.2 Local Leak Detection Tests (continued)

b. Acceptance Criteria

- (1) The total leakage from all penetrations and isolation valves shall not exceed $0.60 L_p$.
- (2) The leakage for a Personnel air lock door seal test shall not exceed $0.023 L_p$.
- (3) An acceptable Emergency Escape Airlock door seal contact check consists of a verification of continuous contact between the seals and the sealing surfaces.

c. Corrective Action

- (1) If at any time it is determined that $0.60 L_p$ is exceeded, repairs shall be initiated immediately. If repairs are not completed and conformance to the acceptance criterion of 4.5.2.b(1) is not demonstrated within 48 hours, the Plant shall be placed in at least hot shutdown within the next 6 hours and in at least cold shutdown within the following 30 hours.
- (2) If at any time it is determined that total containment leakage exceeds L_p , within one hour action shall be initiated to bring the Plant to hot shutdown within the next six (6) hours and cold shutdown within the following thirty (30) hours.
- (3) If the Personnel airlock door seal leakage is greater than $0.023 L_p$, or if the Emergency Escape Lock door seal contact check fails to meet its acceptance criterion, repairs shall be initiated immediately to restore the door seal to the acceptance criteria of specification 4.5.2.b(2) or 4.5.2.b(3). In the event repairs cannot be completed within 7 days, the Plant shall be brought to a hot shutdown condition within the next six (6) hours and cold shutdown within the following thirty (30) hours.

If air lock door seal leakage results in one (1) door causing total containment leakage to exceed $0.60 L_p$, the door shall be declared inoperable and the remaining operable door shall be immediately locked closed* and tested within four (4) hours. As long as the remaining door is found to be operable, the provisions of 4.5.2.c(2) do not apply. Repairs shall be initiated immediately to establish conformance with specification 4.5.2.b(1). In the event conformance to this specification cannot be established within 48 hours the Plant shall be brought to a hot shutdown within the next 6 hours and cold shutdown within the following 30 hours.

* Entry and exit is permissible through a "locked" air lock door to perform repairs on the affected air lock components.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 179 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS ENERGY COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated March 26, 1997, the Consumers Energy Company (the licensee) requested an amendment to the Technical Specifications (TS) appended to Facility Operating License No. DPR-20 for the Palisades Plant. The proposed amendment would revise the Containment Systems TS requirements contained in TS sections 3.6 and 4.5 to closely emulate the format and content of NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," (STS).

One of the requested provisions would incorporate a note to allow opening an operable airlock door to perform repairs on inoperable airlock components when the other airlock door is inoperable. This evaluation addresses only this provision. The remainder of the licensee's proposed changes remain under staff review and will be addressed in separate evaluation.

2.0 EVALUATION

The licensee proposed to add the following footnotes: (1) "Entry and exit is permissible through a "locked" air lock door to perform repairs on other air lock components," to Limiting Condition for Operation (LCO) 3.6.1 on page 3-40, and (2) "Entry and exit is permissible through a "locked" air lock door to perform repairs on the affected air lock components," to the second paragraph of action statement 4.5.2c.(3) on page 4-20. The footnotes would allow entry through an operable airlock door to perform repairs on other airlock components, including an inoperable airlock door. The addition of the footnote to LCO 3.6.1 is intended to assure that the LCO is not interpreted as prohibiting use of the similar footnote added to corrective action 4.5.2c.

The licensee stated that the airlock entry footnote was proposed to eliminate the potential for initiation of an unnecessary plant shutdown. The proposed allowance is the same as that provided in Note 1 of STS LCO 3.6.2, Containment Air Locks. This change is necessary to avoid the possibility of an easily repaired fault on one airlock door leading to initiation of a plant shutdown. Such an event occurred at Palisades during July 1996. During a semiannual airlock pressure test, unquantifiable leakage occurred on the inner door of the personnel airlock. The second paragraph of Action statement 4.5.2c.(3) required that the outer door be immediately locked closed and tested within 4 hours. It also required that repairs be initiated immediately.

Since strongbacks were in place to hold the inner door closed against test pressure and the outer door was required to be locked closed, entry into the airlock to perform repairs was not possible.

If the outer airlock door is inoperable, then it may be easily accessed for most repairs. It is preferred that the airlock be accessed from inside primary containment by entering through the other operable airlock door. However, if this is not practicable, or if repairs on either door must be performed from the barrel side of the door, then it is permissible to enter the airlock through the operable door, which means there is a short time during which the containment boundary is not intact (during access through the operable door).

The staff finds that the allowance to open an operable airlock door when the other door is inoperable, even if it means the containment boundary is temporarily not intact, is acceptable because of the low probability of an event that could pressurize the containment during the short time in which the operable door is expected to be open. After each entry and exit, the operable door must be immediately closed to restore containment integrity.

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 Michigan 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. 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 the amendment involves no significant hazards consideration and there has been no public comment on such finding (62 FR 66136). Accordingly, the 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 the amendment.

5.0 CONCLUSION

The Commission 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: Robert Schaaf

Date: April 8, 1998