

April 13, 1999

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

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT RE: DELETION OF
SNUBBER TECHNICAL SPECIFICATION REQUIREMENTS (TAC NO. MA4497)

Dear Mr. Haskell:

The Commission has issued the enclosed Amendment No. 185 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated September 3, 1997, as supplemented by letters dated March 13, 1998, and March 18, 1999.

The amendment revises the TS to delete specifications related to snubbers. The snubber testing requirements have been relocated to the Palisades Operating Requirements Manual (ORM). The amendment is consistent with the Standard Technical Specifications for Combustion Engineering Plants, NUREG-1432, Revision 1.

By letter dated December 28, 1998, the staff issued a related evaluation authorizing alternative snubber inservice examination requirements. The alternative supersedes existing alternative examination requirements that reference the TS being deleted by this amendment.

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, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures: 1. Amendment No. 185 to DPR-20
2. Safety Evaluation

cc w/encl: See next page

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

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Sincerely,

A handwritten signature in black ink, appearing to read "Robert G. Schaaf".

Robert G. Schaaf, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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DATE	4/6/99		4/8/99	11/24/98	3/25/99		4/12/99	

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DATED: April 13, 1999

AMENDMENT NO. 185 TO FACILITY OPERATING LICENSE NO. DPR-20 - PALISADES

Docket File (50-255)

PUBLIC

PDIII-1 r/f

J. Zwolinski/S. Black

C. Thomas/G. Dick

T. Harris

R. Schaaf

OGC

G. Hill (2)

W. Beckner

ACRS

A. Vogel, RIII

SEDB (RCN)

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

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

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

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

Arunas T. Udryns, 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, Supervisor
Covert Township
P. O. Box 35
Covert, Michigan 49043

Office of the Governor
P. O. Box 30013
Lansing, Michigan 48909

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



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. 185
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 September 3, 1997, as supplemented by letters dated March 13, 1998, and March 18, 1999, 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.

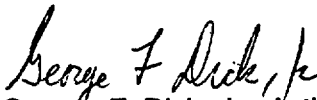
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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 185 , 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, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



George F. Dick, Jr., Acting Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: April 13, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 185

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

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PALISADES PLANT TECHNICAL SPECIFICATIONS
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3.19 IODINE REMOVAL SYSTEM

Basis Iodine Removal System TSP Baskets (continued)

The quantity of TSP placed in containment is designed to adjust the pH of the sump water to be between 7.0 and 8.0. The pH needs to remain < 8.0 to remain within the assumptions of the analysis for post-LOCA Hydrogen concentration in the containment. That analysis concludes that hydrogen generation will not exceed the limits of Regulatory Guide 1.7.

Weight limits: The minimum acceptable amount of TSP is that weight which will ensure a sump solution pH ≥ 7.0 after a LOCA, with the maximum amount of water at the minimum initial pH possible in the containment sump; a maximum acceptable amount of TSP is that weight which could cause a sump solution pH of ≤ 8.0 with a minimum amount of water at a maximum initial pH.

The TSP is stored in wire mesh baskets placed inside the containment at the 590 ft. elevation. Any quantity between 8,300 and 11,000 lb. of TSP will result in a pH in the desired range.

Basis Applicability 3.19

TSP baskets support operation of the Safety Injection System, The Containment Spray System, and the SIRWT. Therefore, the TSP baskets are required to be OPERABLE when the PCS is greater than 300°F.

Basis Action Statements 3.19

The listed Action is required to be completed within the specified time if the conditions of the specification are not met. If, prior to expiration of the specified completion time, the required conditions are restored, completion of the Action is not required. Each specified completion time starts at the time it is discovered that the Action statement is applicable.

Action 3.19.1 - TSP not within limit - If it is discovered that the TSP in the containment building is not within limits, action must be taken to restore the TSP to within limits. The Completion Time of 72 hours is allowed for restoring the TSP within limits, where possible, because 72 hours is the same time allowed for restoration of other ECCS components.

Action 3.19.2 - Required action AND associated completion time not met - If the required action cannot be met within the associated completion time, the plant must be placed in a condition where the inoperable equipment is not required. Twelve hours are allowed to bring the plant to HOT SHUTDOWN, and 48 hours to reach conditions where the affected equipment is not required, to avoid unusual plant transients. Both the 12 and the 48 hour time periods start when it is discovered that Action 3.19.2 is applicable.

(Next Page is 3-84)

Amendment No. 165, 185

3.20 Deleted
3.21 Deleted
3.22 Deleted

3.23 POWER DISTRIBUTION LIMITS

3.23.1 LINEAR HEAT RATE (LHR)

The LHR in the peak power fuel rod at the peak power elevation Z shall be maintained within the limits specified in the COLR.

APPLICABILITY: Power operation above 50% of RATED POWER.

ACTION 1:

When using the incore alarm system to monitor LHR, and with four or more coincident incore alarms, initiate within 15 minutes corrective action to reduce the LHR to within the limits and restore the incore readings to less than the alarm setpoints within 1 hour or failing this, be at less than 50% RATED POWER within the following 2 hours.

ACTION 2:

When using the excore monitoring system to monitor LHR and with the AO deviating from the target AO by more than 0.05, discontinue using the excore monitoring system for monitoring LHR. If the incore alarm system is inoperable, within 2 hours be at 85% (or less) RATED POWER and follow the procedure in ACTION 3 below.

ACTION 3:

If the incore alarm system is inoperable and the excore monitoring system is not being used to monitor LHR, operation at less than or equal to 85% RATED POWER may continue provided that incore readings are recorded manually. Readings shall be taken on a minimum of 10 individual detectors per quadrant (to include a total number of 160 detectors in a 10-hour period) within 4 hours and at least every 2 hours thereafter. If readings indicate a local power level equal to or greater than the alarm setpoints, the action specified in ACTION 1 above shall be taken.

4.15 Primary System Flow Measurement

Applicability

Applies to the measurement of primary system flow rate with four primary coolant pumps in operation.

Objective

To provide assurance that the primary system flow rate is equal to or above the flow rate required in 3.1.1.c.

Specification

After each refueling outage, or after plugging 10 or more steam generator tubes, a primary system flow measurement shall be made with four primary coolant pumps in operation. This measurement shall be made within the first 31 days of rated power operation.

Basis

This surveillance program assures that the reactor coolant flow is consistent with that assumed as the basis for Specification 3.1.1c.

4.16 Deleted

(Next Page is 4-75)



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 185 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS ENERGY COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated September 3, 1997, as supplemented by letters dated March 13, 1998, and March 18, 1999, 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 TS to delete specifications related to snubber operability requirements, action requirements for inoperable snubbers, and snubber testing requirements. The March 18, 1999, submittal requested a 60-day allowance for implementation of the amendment. This change was within the scope of the original *Federal Register* notice and did not change the staff's initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (Act) requires that applicants for nuclear power plant operating licenses state TS and that the TS be included as a part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The rule specifies that LCOs (and associated surveillances) are to be included in a plant's TS if the item meets one or more of the following criteria: (1) an installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary, (2) a process variable, design feature, or operating restriction that is an initial condition of a design-basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design-basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, or (4) a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

3.0 EVALUATION

The licensee proposed to delete the LCO and action requirements of TS 3.20, "Shock Suppressors (Snubbers)," and the associated surveillance requirements of TS 4.16, "Inservice Inspection Program for Shock Suppressors (Snubbers)," from the TS. The licensee stated that deletion of these requirements is consistent with NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants."

TS 3.20.1 states:

When systems associated with snubbers in Specification 3.20 are required to be OPERABLE, the snubbers in those systems shall be OPERABLE except as noted below:

The licensee stated that deletion of this explicit LCO for snubber operability would not remove the necessity for snubbers to be operable. The licensee stated that those snubbers in systems that are required to be operable would still be the subject of TS operability requirements because they are included in the TS definition of operability. Section 1.0 of the Palisades TS defines operability as follows:

A system, subsystem, train, component, or device shall be OPERABLE, or have OPERABILITY, when it is capable of performing its specified functions, and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication, or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified functions are also capable of performing their related support functions.

In other words, for required systems to be considered operable (as defined in Section 1.0 of the TS), required snubbers must be "capable of performing their related support function" since they are "necessary attendant...auxiliary equipment." Therefore, the licensee stated that snubbers installed in systems required to be operable by TS would still be required to be operable.

TS 3.20.1a states:

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

TS Action 3.20.1a provides a 72-hour allowed outage time in which to replace an inoperable snubber, restore it to operable status, or declare the supported system inoperable. As noted above, in order for a system to be considered operable, the associated required snubbers must be capable of performing their related support function. Deletion of TS Action 3.20.1a would require that a supported system be declared inoperable immediately upon discovery that a required snubber is not capable of performing its related support function. Plant operation would then be limited by the actions in the LCO for the supported system. The licensee stated that this proposed treatment of nonfunctional snubbers is the same as that in the STS. The licensee also noted that this change represents a reduction in the time allowed for continued operation when a required snubber is determined to be incapable of performing its related support function.

The licensee proposed to delete the associated testing requirements of TS 4.16. The licensee stated that identical requirements have been added to the Palisades Operating Requirements Manual (ORM). The licensee provided copies of the affected ORM pages for staff review. The ORM has been incorporated into the final safety analysis report (FSAR) by reference, and ORM revisions are controlled under the provisions of 10 CFR 50.59.

The requirements of TS 3.20 and 4.16 are not related to detection or indication of reactor coolant pressure boundary degradation; are not process variables, design features, or operating restrictions that are initial conditions of a design-basis accident or transient analysis; are not part of a primary success path to mitigate a design-basis accident or transient; and have not been shown by operating experience or probabilistic risk assessment to be significant to public health and safety. Therefore, they do not meet the 10 CFR 50.36(c)(2)(ii) criteria and are not required to be in TS.

With respect to the requirements of TS 3.20, the staff does not agree with the licensee's interpretation that the operability definition results in a continued operability requirement for the snubbers. Operability as defined in the TSs is only applicable to systems, structures, and components that have explicit LCOs specified in the TS. In the absence of an explicit LCO for snubbers, the definition merely requires that the snubbers be "capable of performing their related support function." Notwithstanding this distinction, under the proposed change, supported equipment would continue to be required to be declared inoperable due to snubbers being unable to perform their intended function. In fact, the proposed change imposes a more severe restriction on operation due to the reduced total allowed outage time when systems are rendered inoperable due to nonfunctional snubbers. Therefore, the proposed change is acceptable to the staff.

With respect to the requirements of TS 4.16, the staff has verified that the licensee has added identical requirements to the Palisades ORM. The ORM has been incorporated into the FSAR by reference, and ORM revisions are controlled under the provisions of 10 CFR 50.59. Sufficient regulatory controls exist under 10 CFR 50.59 to ensure that any future changes to the snubber testing requirements that constitute an unreviewed safety question will be subject to NRC review and approval prior to implementation. These controls support the proposed deletion of these requirements from the TS. Based on these considerations, the staff finds the proposed deletion of these requirements to be acceptable.

Section 3.15 on page ii of the Table of Contents has been corrected to read "Deleted." This change was made in Amendment 174 but the section title was inadvertently added back to the Table of Contents in Amendment 178. This editorial correction was discussed with the licensee on March 19, 1999.

4.0 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.

5.0 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 changes surveillance requirements. 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 (63 *FR* 17222). 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.

6.0 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: R. Schaaf

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