

April 11, 2003

10 CFR 50.90

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

PALISADES NUCLEAR PLANT
DOCKET 50-255
LICENSE No. DPR-20
LICENSE AMENDMENT REQUEST: TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS SECTION

Pursuant to 10 CFR 50.90, Nuclear Management Company, LLC (NMC) requests Nuclear Regulatory Commission (NRC) review and approval of a proposed license amendment for the Palisades Nuclear Plant. The proposed amendment would revise the Technical Specifications (TS) Administrative Controls section.

Enclosure 1 provides a detailed description of the proposed change, background and technical analysis, No Significant Hazards Determination, and Environmental Review Consideration. Enclosure 2 provides the proposed revised TS pages. Enclosure 3 provides the annotated TS pages showing the changes proposed.

NMC requests approval of this proposed license amendment by November 11, 2003 to support timely implementation of this change. NMC further requests a 60-day implementation period following amendment approval.

A copy of this request has been provided to the designated representative of the State of Michigan.

SUMMARY OF COMMITMENTS

This letter contains the no new commitments and no revisions to existing commitments.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on April 11, 2003.

A handwritten signature in black ink, appearing to be 'Douglas E. Cooper', written over a horizontal line.

Douglas E. Cooper
Site Vice-President, Palisades

CC Regional Administrator, USNRC, Region III
Project Manager, USNRC, NRR
NRC Resident Inspector – Palisades

Enclosures

ENCLOSURE 1

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
DOCKET 50-255**

**LICENSE AMENDMENT REQUEST PURSUANT TO 10 CFR 50.90:
TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS SECTION**

5 Pages Follow

1.0 INTRODUCTION

Nuclear Management Company, LLC (NMC) requests to amend Operating License DPR-20 for the Palisades Nuclear Plant. The proposed change would revise Appendix A, Technical Specifications (TS) Administrative Controls section.

2.0 DESCRIPTION OF THE PROPOSED AMENDMENT

NMC proposes to revise TS section 5 as follows:

Specification 5.4.1.a is revised to correct two editorial errors.

Specification 5.5.2.e is revised to delete "(approximately 44 psig)" from the description of test conditions required for maximum allowable leakage from recirculation heat removal system components.

Specification 5.6.1 is revised to correct several editorial errors.

3.0 BACKGROUND

TS section 5.4.1 describes the administrative controls for written procedures. The proposed editorial corrections to section 5.4.1.a are a result of editorial errors that were inadvertently created during Amendment 196 to Facility Operating License No. DPR-20 dated May 3, 2001. The errors primarily consisted of failing to include the term "Appendix A" when describing applicable procedures recommended in Regulatory Guide 1.33. The original license amendment request for Amendment 196, dated December 7, 2000, contained a revised TS page that contained these editorial errors that were subsequently approved and issued as part of the amendment.

TS section 5.5.2.e describes the maximum allowable leakage criteria from recirculation heat removal system components. The proposed change to section 5.5.2.e modifies this criteria, which has existed since 1971 when the initial TS for Palisades License No. DPR-20 was issued. The parenthetical statement of "approximately 44 psig" was intended to clarify the test conditions for the maximum allowable leakage acceptance criteria of recirculation heat removal system components. The normally available hydrostatic head from the Safety Injection and Refueling Water (SIRW) Tank, which is described in the Palisades Final Safety Analysis Report (FSAR), physically limits these test conditions. Further review by NMC of the hydrostatic head normally available from the SIRW Tank has revealed that the value of 44 psig is not a credible value for any of the components covered by this specification. NMC has also determined that

inclusion of this approximate value is not required per 10 CFR 50.36. Deletion of this approximate value would make this specification technically correct and would not detract from the specification's test condition criteria. The testing program described by TS section 5.5.2 is controlled by plant procedures.

TS section 5.6.1 describes requirements for Occupational Radiation Exposure Reports. The latest revision of this TS section was incorporated into Palisades TS during Amendment 189 to Facility Operating License No. DPR-20 dated November 30, 1999. Amendment 189 version of this TS section was intended to be consistent with the Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-152. The original license amendment request for Amendment 189, dated January 26, 1998, contained errors that were then subsequently approved and issued as part of the amendment. These errors consisted of: omission of the word "collective" when describing associated collective deep dose equivalent, and omission of the words "received from" when describing the 80% of total deep dose equivalent received from external sources. NMC has also included other minor changes to TS section 5.6.1 to align it with the current wording in NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," revision 2.

4.0 TECHNICAL ANALYSIS

The proposed change to section 5.4.1.a is editorial in nature.

The proposed change to section 5.5.2.e deletes an erroneous test condition approximate value. NMC had determined that the approximate test pressure for components covered by this specification is less than the approximate value cited in existing TS 5.5.2.e. The actual test pressure available varies since it is a function of each individual component's elevation and the level of the SIRW tank that provides the hydrostatic head. Replacement with a revised single approximate value would not be appropriate since individual component elevations can account for several psig difference for component test conditions. The key element, i.e. "normal hydrostatic head from the SIRW tank," appropriately characterizes the test condition for all components covered by this specification. Therefore, deletion of this approximate value does not adversely affect the specification's test condition criteria.

The proposed change to section 5.6.1 is editorial in nature and restores this specification to the wording that was originally intended for Amendment 189. The proposed change is consistent with Nuclear Regulatory Commission approved STS change TSTF-152 and NUREG-1432 revision 2.

Therefore, these proposed changes will have no adverse effect on plant safety.

5.0 NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Nuclear Management Company, LLC (NMC) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment using the three standards set forth in 10 CFR 50.92, "Issuance of Amendment." The following evaluation supports the finding that operation of the facility in accordance with the proposed change would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed license amendment provides changes to Technical Specification (TS) Administrative Controls sections 5.4.1.a, 5.5.2.e, and 5.6.1. The proposed corrections to TS 5.4.1.a are editorial in nature. The proposed correction to TS 5.5.2.e, which deletes an erroneous approximate value from the description of test conditions for maximum allowable leakage from recirculation heat removal system components, is consistent with the existing plant design as described in the Palisades Final Safety Analysis Report. The proposed correction to TS 5.6.1 is editorial in nature and is consistent with the Nuclear Regulatory Commission approved standard technical specifications. The proposed amendment does not involve operation of the required structures, systems or components (SSCs) in a manner or configuration different from those previously recognized or evaluated.

Therefore, operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment does not involve a physical alteration of any SSC or a change in the way any SSC is operated. The proposed amendment does not involve operation of any required SSCs in a manner or configuration different from those previously recognized or evaluated. No new failure mechanisms will be introduced by the changes being requested.

Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The proposed amendment does not affect any margin of safety. The proposed amendment does not involve any physical changes to the plant or manner in which the plant is operated.

Therefore, the proposed amendment would not involve a significant reduction in a margin of safety.

Based on the evaluation above, NMC has determined that the proposed changes do not involve significant hazards consideration.

6.0 ENVIRONMENTAL REVIEW CONSIDERATION

NMC has determined that the proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 CONCLUSION

Based on the considerations described above, (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. The Palisades Plant Review Committee has reviewed this amendment request and has determined that the change involves no significant hazards consideration. The Palisades Offsite Safety Review Committee has concurred in this determination.

ENCLOSURE 2

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
DOCKET 50-255**

**LICENSE AMENDMENT REQUEST PURSUANT TO 10 CFR 50.90:
TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS SECTION**

**REVISED TECHNICAL SPECIFICATION PAGES 5.0-5, 5.0-7, AND 5.0-24
AND
TECHNICAL SPECIFICATION PAGE CHANGE INSTRUCTIONS**

4 Pages Follow

ATTACHMENT TO LICENSE AMENDMENT NO.

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following pages of Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

5.0-5

5.0-7

5.0-24

INSERT

5.0-5

5.0-7

5.0-24

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

- 5.4.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.
 - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
 - c. Site Fire Protection Program implementation.
 - d. All programs specified in Specification 5.5.
-

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage to the engineered safeguards rooms, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident, to as low as practical. The systems include the Containment Spray System, the Safety Injection System, the Shutdown Cooling System, and the containment sump suction piping. This program shall include the following:

- a. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.
- c. The portion of the shutdown cooling system that is outside the containment shall be tested either by use in normal operation or hydrostatically tested at 255 psig.
- d. Piping from valves CV-3029 and CV-3030 to the discharge of the safety injection pumps and containment spray pumps shall be hydrostatically tested at no less than 100 psig.
- e. The maximum allowable leakage from the recirculation heat removal systems' components (which include valve stems, flanges and pump seals) shall not exceed 0.2 gallon per minute under the normal hydrostatic head from the SIRW tank.

5.5.3 Post Accident Sampling Program

[deleted]

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

This report shall include a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent greater than 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, electronic dosimeter, thermoluminescence dosimeter (TLD), or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2 Radiological Environmental Operating Report

The Radiological Environmental Operating Report covering the operation of the plant during the previous calendar year shall be submitted before May 15 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering operation of the plant in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the plant. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual and Process Control Program, and shall be in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

ENCLOSURE 3

**NUCLEAR MANAGEMENT COMPANY
PALISADES NUCLEAR PLANT
DOCKET 50-255**

**LICENSE AMENDMENT REQUEST PURSUANT TO 10 CFR 50.90:
TECHNICAL SPECIFICATION
ADMINISTRATIVE CONTROLS SECTION**

**MARK-UP OF TECHNICAL SPECIFICATION
PAGES 5.0-5, 5.0-7, AND 5.0-24
(showing proposed changes)
(additions are double underlined; deletions are strikethrough)**

3 Pages Follow

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

- 5.4.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:
- a. The applicable procedures recommended in ~~of~~ Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.
 - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
 - c. Site Fire Protection Program implementation.
 - d. All programs specified in Specification 5.5.
-

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage to the engineered safeguards rooms, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident, to as low as practical. The systems include the Containment Spray System, the Safety Injection System, the Shutdown Cooling System, and the containment sump suction piping. This program shall include the following:

- a. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.
- c. The portion of the shutdown cooling system that is outside the containment shall be tested either by use in normal operation or hydrostatically tested at 255 psig.
- d. Piping from valves CV-3029 and CV-3030 to the discharge of the safety injection pumps and containment spray pumps shall be hydrostatically tested at no less than 100 psig.
- e. The maximum allowable leakage from the recirculation heat removal systems' components (which include valve stems, flanges and pump seals) shall not exceed 0.2 gallon per minute under the normal hydrostatic head from the SIRW tank (~~approximately 44 psig~~).

5.5.3 Post Accident Sampling Program

[deleted]

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

This report shall include a tabulation on an annual basis of the number of stations, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent greater than 100 mrem_s and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, electronic dosimeter, thermoluminescence dosimeter (TLD), or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

5.6.2 Radiological Environmental Operating Report

The Radiological Environmental Operating Report covering the operation of the plant during the previous calendar year shall be submitted before May 15 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering operation of the plant in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the plant. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual and Process Control Program, and shall be in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.