

December 15, 2003

Mr. Daniel J. Malone
Site Vice President
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT REGARDING
ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL
SPECIFICATIONS (TAC NO. MB8755)

Dear Mr. Malone:

The Commission has issued the enclosed Amendment No. 213 to Facility Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 11, 2003.

The amendment revises TS Section 5.0, "Administrative Controls," to make various administrative, editorial, and typographical changes.

Your application also proposed a change to TS 5.6.1 to change "100 mrem" to "100 mrems." We find that use of the plural form of "mrem" is optional, and also inconsistent with the use of the term elsewhere in the Palisades TSs and other documents such as the Final Safety Analysis Report and the Offsite Dose Calculation Manual. Therefore, we have not approved this proposed change.

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,

/RA/

Darl S. Hood, Senior 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. 213 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

December 15, 2003

Mr. Daniel J. Malone
Site Vice President
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT REGARDING
ADMINISTRATIVE CONTROLS SECTION OF THE TECHNICAL
SPECIFICATIONS (TAC NO. MB8755)

Dear Mr. Malone:

The Commission has issued the enclosed Amendment No. 213 to Facility Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 11, 2003.

The amendment revises TS Section 5.0, "Administrative Controls," to make various administrative, editorial, and typographical changes.

Your application also proposed a change to TS 5.6.1 to change "100 mrem" to "100 mrems." We find that use of the plural form of "mrem" is optional, and also inconsistent with the use of the term elsewhere in the Palisades TSs and other documents such as the Final Safety Analysis Report and the Offsite Dose Calculation Manual. Therefore, we have not approved this proposed change.

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,

/RA/

Darl S. Hood, Senior 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. 213 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION

PUBLIC OGC TBoyce
PDIII-1 Reading ACRS TQuay
LRaghavan RDennig
DHood GHill(2)
RBouling AVegel, RGN-III

OFFICE	PDIII-1/PM	PDIII-1/LA	IROB	IEPB	OGC	PDIII-1/SC
NAME	DHood	RBouling	TBoyce	GCwalina for TQuay	DCummings	LRaghavan
DATE	11/20/03	11/19/03	11/21/03	11/21/03	11/25/03	12/04/03

ADAMS Accession Nos.: ML033490630 (Package)
ML033030121 (Amendment)
ML033490585 (TS)

OFFICIAL RECORD COPY

Palisades Plant

cc:

Robert A. Fenech, Senior Vice President
Nuclear, Fossil, and Hydro Operations
Consumers Energy Company
1945 Parnall Rd.
Jackson, MI 49201

Arunas T. Udryns, Esquire
Consumers Energy Company
1 Energy Plaza
Jackson, MI 49201

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

Supervisor
Covert Township
P. O. Box 35
Covert, MI 49043

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

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

Michigan Department of Environmental Quality
Waste and Hazardous Materials Division
Hazardous Waste and Radiological
Protection Section
Nuclear Facilities Unit
Constitution Hall, Lower-Level North
525 West Allegan Street
P.O. Box 30241
Lansing, MI 48909-7741

Michigan Department of Attorney General
Special Litigation Division
525 West Ottawa St.
Sixth Floor, G. Mennen Williams Building
Lansing, MI 48913

Manager, Regulatory Affairs
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043

Director of Nuclear Assets
Consumers Energy Company
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

John Paul Cowan
Executive Vice President & Chief Nuclear
Officer
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Jonathan Rogoff, Esquire
Vice President, Counsel & Secretary
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Douglas E. Cooper
Senior Vice President - Group Operations
Palisades Nuclear Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043

October 2003

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 213

License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Nuclear Management Company, LLC (the licensee), dated April 11, 2003, 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. 213 , and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. NMC 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

/RA/

L. Raghavan, 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: December 15, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 213

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following pages of the 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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATING TO AMENDMENT NO. 213 TO FACILITY OPERATING LICENSE NO. DPR-20
NUCLEAR MANAGEMENT COMPANY, LLC

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By application dated April 11, 2003, the Nuclear Management Company, LLC (the licensee), requested changes to the Technical Specifications (TSs) for the Palisades Plant. The proposed amendment would revise TS Section 5.0, "Administrative Controls," to make various administrative, editorial, and typographical changes. Specifically, the proposed changes would:

- (1) correct TS 5.4.1.a by adding "Appendix A" after the reference to "Regulatory Guide 1.33, Revision 2," and deleting "of" before this reference.
- (2) change TS 5.5.2.e by deleting the phrase "(approximately 44 psig)" which is an invalid reference to the normal hydrostatic head from the safety injection refueling water tank for the test conditions required for maximum allowable leakage from recirculation heat removal systems' components.
- (3) make several editorial changes to TS 5.6.1 to be consistent with the wording of NUREG-1432, "Standard Technical Specifications—Combustion Engineering Plants," Revision 2 (STS), and the changes to the STS in Technical Specification Task Force (TSTF) Traveler TSTF-152, "Revise Reporting Requirements to be Consistent with 10 CFR [Part] 20." The editorial changes include (a) adding the word "collective" to describe the associated collective deep dose equivalent, (b) adding "thermoluminescence dosimeter" to define its acronym "(TLD)," (c) changing "stations" to "station," (d) adding the words "received from" when describing the 80 percent of total deep dose equivalent received from external sources, and (e) making punctuation changes.

In its application, the licensee also proposed to change "100 mrem" to "100 mrems" in TS 5.6.1. The Nuclear Regulatory Commission (NRC) staff finds that use of the plural form of "mrem" is optional, and also inconsistent with the use of the term elsewhere in the Palisades TSs and other documents such as the Final Safety Analysis Report and the Offsite Dose Calculation Manual. Therefore, the NRC staff has not approved this proposed change.

2.0 REGULATORY EVALUATION

The changes to TS 5.6.1 were proposed, in part, to conform to the wording of TSTF-152. The NRC staff approved TSTF-152 on March 13, 1997. Therefore, the April 11, 2003, application constitutes a request for TS changes, to the extent applicable to the Palisades Plant, that the NRC staff has previously approved generically for the Combustion Engineering Standard Technical Specifications, NUREG-1432, Revision 2. The licensee also included other minor changes to TS 5.6.1 for consistency with the wording in NUREG-1432, Revision 2.

3.0 TECHNICAL EVALUATION

TS 5.4.1 describes the administrative controls for written procedures. TS 5.4.1 currently contains two editorial errors that were introduced by the licensee's license amendment application dated December 7, 2000, which forwarded a revised TS page for use to this end. Within Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation), Revision 2, dated February 1978, typical safety-related activities that should be covered by written procedures are listed in Appendix A of RG 1.33, rather than in the main body of RG 1.33. The revised TS page failed to include the term "Appendix A" when describing applicable procedures recommended in this RG, and also inadvertently included the word "of" before "Regulatory Guide 1.33" (i.e., "...applicable procedures recommended in of Regulatory Guide 1.33..."). The NRC staff used this TS page containing the two errors when issuing Amendment No. 196, dated May 3, 2001. The changes proposed in the April 11, 2003, application would correct these editorial errors by adding "Appendix A" and deleting "of." The NRC staff finds that the more specific reference to the RG is appropriate, and that deleting "of" in this specification is purely an editorial correction. These two corrections have no adverse effect upon the safety of the facility and are therefore acceptable.

TS 5.5.2.e describes the maximum allowable leakage criteria from the recirculation heat removal systems' components under the normal hydrostatic head from the SIRW tank. TS 5.5.2.e currently indicates that this normal hydrostatic head is "(approximately 44 psig)." The licensee notes that this approximate value is erroneous and is not a credible value for any of the components (located at various elevations) covered by this specification. The various elevations of the components covered by this specification result in significant psig differences for component test conditions, such that specifying a single approximate value for the hydrostatic head is not appropriate. The NRC staff finds that the testing program described by TS 5.5.2 is appropriately controlled by plant procedures and is sufficiently characterized in TS 5.5.2 by the reference to "normal hydrostatic head from the SIRW tank," without including a specified approximate value. The specified approximate value is not needed in the TS. Therefore, deleting this erroneous approximate value is appropriate and acceptable.

TS 5.6.1, which describes requirements for Occupational Radiation Exposure Reports, currently contains several errors in wording and punctuation which differ from the licensee's intended adherence to TSTF-152 and NUREG-1432, Revision 2. These errors were introduced by the January 26, 1998, application which proposed a license amendment to change TS 5.6.1 and forwarded a revised TS page for use to this end. The NRC staff used the revised TS page to issue Amendment No. 189 on November 30, 1999. These errors included omitting the word "collective" when describing associated collective deep dose equivalent, omitting "thermoluminescence dosimeter" to identify its acronym "(TLD)," using "stations" for "station," and omitting the words "received from" when describing the 80 percent of total deep dose

equivalent received from external sources. The errors also included some punctuation changes. The NRC staff has reviewed the proposed corrections and finds that they improve consistency with TSTF-152 and NUREG-1432, Revision 2 and are therefore acceptable.

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 State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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: D. Hood

Date: December 15, 2003