



**Consumers
Power
Company**

REGULATORY DOCKET FILE COPY

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Director, Nuclear Reactor Regulation
Att: Mr Dennis L Ziemann, Chief
Operating Reactors Branch No 2
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - CLARIFICATION OF
BORON DILUTION TECHNICAL SPECIFICATION -
REVISION 1

Technical Specification 3.1.1a, if taken literally, requires one primary coolant pump or one shutdown cooling pump to be in operation when either raising or lowering the boron concentration of the primary coolant. This would preclude boration of the primary coolant system following a loss of coolant flow accident.

A more reasonable interpretation, which is consistent with the proposed Palisades Standard Technical Specifications, is as follows:

At least one primary coolant pump or one shutdown cooling pump shall be in operation whenever a change in primary coolant system boron concentration is being made except during an emergency loss of coolant flow situation. Under these circumstances the boron concentration may be increased with no primary coolant pumps or shutdown cooling pumps running.

Consumers Power Company intends to operate the Palisades Plant utilizing the latter interpretation of this Technical Specification until such time as the Standard Technical Specifications replace our present Technical Specifications.

David P Hoffman
Assistant Nuclear Licensing Administrator

CC: JGKeppler, USNRC

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