

CONSUMERS POWER COMPANY
Docket 50-255
Request for Change to the Technical Specifications
License DPR-20

For the reasons hereinafter set forth, it is requested that Provisional Operating License DPR-20, Docket 50-255, issued to Consumers Power Company on October 16, 1972, for the Palisades Plant be changed as described in Section I below:

I. Changes

- A. Add a paragraph to basis section 3.22.2 reading:

"Those hose stations that are supplied by the service water system in the containment will be primarily used during normal refueling operations."

- B. Add new items j and k to Section 3.22.4.1 to read:

"j. - North stairway in containment 612' level

"k. - South stairway in containment 612' level"

- C. Revise the introductory sentence of Section 4.17.4.1 to read:

"Each fire hose station defined in Section 3.22.4.1 a through i shall be verified to be OPERABLE":

- D. Add a new Section 4.17.4.2. reading:

"4.17.4.2 - Each fire hose station defined in Section 3.22.4.1 j and k shall be verified to be OPERABLE:

"a. At least once per month during normal refueling outages by visual inspection of the station to assure all equipment is available.

"b. At least once per refueling outage by removing the hose for inspection and reracking and replacing all gaskets in the couplings as required.

"c. At least once per 3 years by:

"(1) Partially opening each hose station valve to verify valve operability and no flow blockage, and

"(2) Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station."

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E. Revise Section 3.22.1.1 Action 1 to read:

"Except the detectors located inside containment, within one hour, establish a fire watch patrol to inspect the zone with the inoperable instrument(s) at least once per hour."

F. Revise Table 3.22.1 as shown in the attached revised pages.

G. Add a new item g to Section 3.22.3.1 reading:

"g. - Intake Structure Room 136 and 136A"

H. Revise Section 4.17.1.1 and add new Section 4.17.1.2 as follows:

"4.17.1.1 - Fire detection instruments located inside containment and associated alarms identified in Table 3.22.1 shall be demonstrated OPERABLE at least once each refueling outage.

"4.17.1.2 - Fire detection instruments located outside containment and associated alarms identified in Table 3.22.1 shall be demonstrated OPERABLE at least once semiannually."

NOTE: Revised Technical Specifications pages are attached.

II. Discussion

Amendment 42 to License DPR-20, issued September 1, 1978, requires certain modifications at Palisades for purposes of fire protection. The required modifications include new hose stations in the containment building, additional fire detectors, and additional fire suppression sprinklers. This change adds this additional fire protection equipment to the existing Technical Specifications operability and surveillance requirements for similar equipment.

III. Conclusion

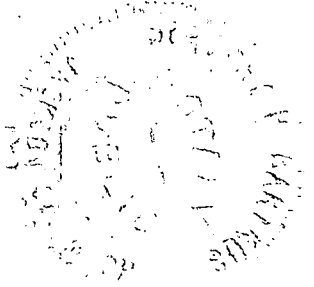
Based on the foregoing, both the Palisades Plant Review Committee and the Safety and Audit Review Board have reviewed these changes and find them acceptable.

CONSUMERS POWER COMPANY

By R B DeWitt
R B DeWitt, Vice President
Nuclear Operstions

Sworn and subscribed to before me this 31st day of January, 1980.

Dorothy H. Bartkus
Dorothy H Bartkus, Notary Public
Jackson County, Michigan
My commission expires March 26, 1983.



3.22.2 FIRE PROTECTION SYSTEM

Basis

The operability of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety-related equipment is located. The fire suppression system consists of the water system, sprinklers, and fire hose stations. The collective capability of the fire suppression system is adequate to minimize potential damage to safety-related equipment and is a major element in the facility fire protection program.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a twenty-four hour report to the Commission provides for prompt evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued protection of the nuclear plant.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is restored to OPERABILITY.

Those hose stations that are supplied by the service water system in the containment will be primarily used during normal refueling operations.

FIRE PROTECTION SYSTEM

3.22.4 FIRE HOSE STATIONS

LIMITING CONDITIONS FOR OPERATION

3.22.4.1 The fire hose stations in the following locations shall be OPERABLE:

- a. Corridor, Room 239
- b. Viewing Gallery, Room 320
- c. Corridor, Room 106
- d. Corridor, Room 125
- e. Fire Hose Station #3
- f. Turbine Building 590' Col Y-5
- g. Turbine Building 590' Col Y-18
- h. Spent Fuel Pool, Room 220
- i. Turbine Building 609' Col H-9
- j. North Stairway in containment 612' level
- k. South Stairway in containment 612' level

APPLICABILITY: Whenever equipment in the area protected by that hose station is required to be operable.

ACTION:

1. With the hose station inoperable, provide an additional hose for the unprotected area at an OPERABLE hose station within 1 hour.
2. In the event this Limiting Condition for Operation and/or associated Action requirement cannot be satisfied, provisions relating to operating restrictions on the plant are not applicable.

Basis

Refer to Basis Section 3.22.2

FIRE PROTECTION SYSTEM

4.17.4 FIRE HOSE STATIONS

SURVEILLANCE REQUIREMENTS

4.17.4.1 Each fire hose station defined in Section 3.22.4.1 a through i shall be verified to be OPERABLE:

- a. At least once per month by visual inspection of the station to assure all equipment is available.
- b. At least once per 18 months by removing the hose for inspection and reracking and replacing all gaskets in the couplings as required.
- c. At least once per 3 years by:
 - 1) Partially opening each hose station valve to verify valve operability and no flow blockage, and
 - 2) Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.

4.17.4.2 Each fire hose station defined in Section 3.22.4.1 j & k shall be verified to be operable:

- a. At least once per month during normal refueling outage by visual inspection of the station to assure all equipment is available.
- b. At least once per refueling outage by removing the hose for inspection and reracking and replacing all gaskets in the couplings as required.
- c. At least once per 3 years by:
 - 1) Partially opening each hose station valve to verify valve operability and no flow blockage, and
 - 2) Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.

3.22 FIRE PROTECTION SYSTEM

3.22.1 FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.22.1.1 The fire detection instrumentation for each fire detection zone shown in Table 3.22.1 shall be OPERABLE.

APPLICABILITY: At all times when equipment in that fire detection zone is required to be OPERABLE.

ACTION:

With the number of instruments OPERABLE less than required by Table 3.22.1;

1. Except the detectors located inside containment, within one hour, establish a fire watch patrol to inspect the zone with the inoperable instrument(s) at least once per hour.
2. Restore the inoperable instrument(s) to OPERABLE status within 14 days, or
3. In lieu of any other report required by Specification 6.9.2, prepare and submit a Special Report to the Commission with 30 days outlining the action taken, the cause of the inoperability and the plans for restoring the instrument(s) to OPERABLE status, and
4. In the event this Limiting Condition for Operation and/or associated Action requirements cannot be satisfied, provisions relating to operating restrictions on the plant are not applicable.

BASIS:

OPERABILITY of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires. This capability is required in order to detect and locate fires in their early stages. Prompt detection of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

In the event that a portion of the fire detection instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is returned to service.

TABLE 3.22.1
NUMBER OF
DETECTORS

<u>INSTRUMENT LOCATION</u>	<u>NUMBER OF</u> <u>DETECTORS</u>	<u>TYPE OF</u> <u>DETECTORS</u>	<u>MINIMUM</u> <u>INSTRUMENTS OPERABLE</u>
1. Cable Spreading Room Col M-28	1	Water Flow Sw	1
2. Switchgear Room 1D Col G-28 Col G-22 Col G-22	3	Water Flow Sw	3
3. Diesel Generator Room 1-1 Col M-28	1	Water Flow Sw	1
4. Diesel Generator Room 1-2 Col J-28	1	Water Flow Sw	1
5. Turbine Building 590' Col H-9	1	Water Flow Sw	1
6. Control Room and Room 325	6	Smoke	2
7. Control Room Adjacent Offices Rooms 324 & 320	2	Smoke	0
8. Cable Spreading Room (224) Area	8	Smoke	3
9. Refueling and Spent Fuel Area, Rm 220	4	Smoke	2
10. Switchgear Room 1-D Room 223	4	Smoke	1
11. North Penetration Room 332	2	Smoke	1
12. Switchgear Room 1-C Room 116A	2	Smoke	1
13. Southwest Cable Penetration, Rm 250	2	Smoke	1
14. Engineered Safeguards Panel Area and Stairwell	4	Smoke	1
15. Component Cooling Pump Room 123	2	Smoke	1
16. Safeguard Area Rooms 4 and 5	5	Smoke	3
17. Corridor 106 on 590' Elevation	6	Smoke	2
18. Charging Pump Room 104	2	Smoke	1

PROPOSED

TABLE 3.22.1 (Contd)

<u>INSTRUMENT LOCATION</u>	<u>NUMBER OF DETECTORS</u>	<u>TYPE OF DETECTORS</u>	<u>MINIMUM INSTRUMENTS OPERABLE</u>
19. Containment, Interior North Penetration Area	3	Smoke	2
20. Containment, Interior Southwest Penetration Area	3	Smoke	2
21. Containment Instrument Air Room	3	Smoke	2
22. Auxiliary Feed Pump Room 570' level of Turbine Building	1	Smoke	1
23. Battery Room 225A	1	Smoke	1
24. Battery Room 225B	1	Smoke	1

PROPOSED

FIRE PROTECTION SYSTEM

3.22.3 FIRE SPRINKLER SYSTEM

LIMITING CONDITIONS FOR OPERATION

3.22.3.1 The sprinkler systems located in the following areas shall be OPERABLE:

- a. Cable Spreading Room
- b. Switchgear Room 1D
- c. Diesel Generator Room 1-1
- d. Diesel Generator Room 1-2
- e. Southwest Cable Penetrating Room
- f. Cable Way Room 328
- g. Intake Structure Room 136 and 136A

APPLICABILITY:

Whenever equipment in the sprinkler protected area is required to be operable.

ACTION:

1. With one or more of the above required sprinkler systems inoperable, establish a continuous fire watch with backup fire suppression equipment in the unprotected area(s) within 1 hour. Restore the system(s) to operable status within 14 days, or, in lieu of any other report required by Specification 6.9.2, prepare and submit a Special Report to the Commission within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to operable status.
2. In the event this Limiting Condition for Operation and/or associated Action requirements cannot be satisfied, any provisions relating to the operating restrictions on the plant are not applicable.

Basis

Refer to Basis Section 3.22.2.

4.17 FIRE PROTECTION SYSTEM

4.17.1 FIRE DETECTION INSTRUMENTATION

SURVEILLANCE REQUIREMENTS

4.17.1.1 Fire detection instruments located inside containment and associated alarms identified in Table 3.22.1 shall be demonstrated operable at least once each refueling outage.

4.17.1.2 Fire detection instruments located outside containment and associated alarms identified in Table 3.22.1 shall be demonstrated operable at least once semiannually.