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 the Technical Specifications contained in the 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. Change(s)

A. Add the following to Section 3.1.1:

"i. The PCS shall not be heated or maintained above 325°F unless a minimum of 375 kW of pressurizer heater capacity is available from both buses 1D and 1E. Should heater capacity from either bus 1D or 1E fall below 375 kW, either restore the inoperable heaters to provide at least 375 kW of heater capacity from both buses 1D and 1E within 72 hours or be in hot shutdown within the next 12 hours."

B. Add the following to Table 3.17.4:

TABLE 3.17.4 (Contd)

No	Functional Unit	Minimum Operable Channels	Minimum Degree of Redundancy	Permissible Bypass Conditions
9.	Pressurizer Water Level (LI-0102)	2	1	Not Required in Cold or Refueling Shutdown
10.	Pressurizer Code Safety Relief Valve Position Indication (Acoustic Monitor or Temperature Indication)	1 per Valve	None	Not Required Below 325°F
11.	Subcooling Margin Monitor	1	None	Not Required Below 210°F
12.	Auxiliary Feed Flow Rate Indication	1 per Steam Generator	None	Not Required Below 325°F
13.	Auxiliary Feed Pump Auto Initiation Circuitry	1 per (g) Pump	None	Not Required Below 325°F

(g) With either auxiliary feed pump automatic initiation circuit inoperable, in lieu of the requirement of 3.17.2, provide a second licensed operator in the control room within 2 hours.

C. Add the following to Table 4.1.3:

TABLE 4.1.3

No	Channel Description	Surveillance Function	Frequency	Surveillance Method
18.	Auxiliary Feed Pump Flow Indication	a. Check b. Calibrate	M (5) R	a. Comparison of Channels b. Known Differential Pressure Applied to Sensors
19.	Auxiliary Feed Pump Auto Initiation	a. Test b. Calibrate	M (5) R	a. Internal Test Signal b. Known Differential Pressure Applied to Sensors
20.	Pressurizer Code Safety Relief Valve Position Indication			
	a. Temperature	a. Calibrate b. Check	R S	a. Known Resistance Substituted for RTD b. Comparison of Channels
	b. Acoustic Monitor	a. Calibrate	R	a. Inject Calibrated Test Signal
21.	Subcooling Margin Monitor	a. Check b. Calibrate	S R	a. Comparison of Channels b. Known Resistance Substituted for RTD Coincident With Known Pressure Input (3)

NOTES: (3) In conjunction with Item 4(b), Table 4.1.1.
(5) It is not necessary to perform the specified testing during the cold shutdown condition.

II. Discussion

The above proposed Technical Specifications changes are associated with actions taken by Consumers Power Company in response to the Category "A" items of the Commission's recommendations resulting from TMI-2 Lessons Learned.

Your letter, dated July 2, 1980, provided proposed specifications in standard technical format to define system designs, LCOs, associated actions and surveillance requirements for (1) emergency power supply, (2) valve position indication, (3) instrumentation for inadequate core cooling, (4) containment isolation, (5) auxiliary feedwater systems, and (6) shift technical advisors.

(1) Emergency Power Supply - Since the pressurizer water level indicators, pressurizer relief and block valves and pressurizer heaters are important in a post-accident situation, the NRC states that adequate emergency power should be supplied to these components to ensure that they function properly.

The addition of Section 3.1.1i to the Palisades Plant Technical Specifications provides assurance that pressurizer heater capacity is available by requiring both 1D and 1E electrical buses to be operable when the PCS is ≥ 325°F. If either bus falls below 375 kW, when PCS is ≥ 325°F, then restore the inoperable heaters to provide at least 375 kW of heater capacity within 72 hours or be in hot shutdown within the next 12 hours.

The pressurizer water level requirements are displayed in Table 3.17.4, Item (g). This table is for instrumentation operating requirements. In the event that the number of channels of the pressurizer water level system falls below the limits given in the column "Minimum Operable Channels" or "Minimum Degree of Redundancy," except as noted by the column noted "Permissible Bypass Conditions," the reactor will be placed in hot shutdown within 12 hours. If minimum conditions are not met within 24 hours, the reactor will be placed in cold shutdown within 24 hours.

The pressurizer relief valves and block valves requirements are displayed in Tables 3.17.4, Item 10 and 4.1.3, Item 20 of the Palisades Plant.

In the event the number of channels of pressurizer code safety relief valve position indication system service falls below the limits given in the columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy," except as conditioned by the column entitled "Permissible Bypass Conditions" (Table 3.17.4), the reactor shall be placed in a hot shutdown condition within 12 hours. If minimum conditions are not met within 24 hours, the reactor shall be placed in a cold shutdown condition within 24 hours.

Table 4.1.3 provides surveillance requirements for the Palisades Plant.

(2) Valve Position Indication - This item is addressed above under Pressurizer Relief Valve Requirements.

(3) Instrumentation for Inadequate Core Cooling - This item is covered in Tables 3.17.4, Item 11 and 4.1.3, Item 21. Table 3.17.4 provides instrumentation operating requirements.

In the event the number of channels for the Inadequate Core Cooling System service falls below the limits given in the columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy," except as conditioned by the column entitled "Permissible Bypass Conditions," the reactor shall be placed in a hot shutdown condition within 12 hours. If minimum conditions are not met

within 24 hours, the reactor shall be placed in a cold shutdown condition within 24 hours.

Table 4.1.3 provides surveillance requirements for inadequate core cooling (subcooling margin monitor) for the Palisades Plant.

(4) Containment Isolation - The present Palisades Technical Specifications are adequate to address this area.

(5) Auxiliary Feedwater Systems - These items are covered in Tables 3.17.4, Item 13 and 4.1.3, Items 18 and 19. Table 3.1.7 provides instrumentation operating requirements.

In the event the number of channels for auxiliary feedwater auto initiation and flow indication service falls below the limits given in the columns entitled "Minimum Operable Channels" or "Minimum Degree of Redundancy," except as conditioned by the column entitled "Permissible Bypass Conditions," the reactor shall be placed in a hot shutdown condition within 12 hours. If minimum conditions are not met within 24 hours, the reactor shall be placed in a cold shutdown condition within 24 hours.

Table 4.1.3 provides surveillance requirements for the auxiliary feedwater auto initiation and flow indication.

(6) Shift Technical Advisor - This item will not be addressed at this time. Upon establishment of our corporate position, information regarding this item will be provided.

Our existing Technical Specifications (TS) already address the issue of systems integrity measurements. No further TS changes are needed at this time.

We are presently operating under an interim method of an iodine measurement system which has been accepted by the NRC, providing extensive TS changes for this method would not be advantageous since they would have to be completely changed upon installing our permanent iodine measurement system. Both the system integrity and iodine measurement topics have been previously addressed in our March 4, 1980 TMI submittal.

These proposed TSs address these topics in current Palisades Plant TS format. These changes, along with the existing TS for these topics, adequately address the concerns of your July 2, 1980 letter.

III. Conclusion(s)

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 12/18

R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 18th day of December 1980.

Linda K. Carstens

Linda K Carstens, Notary Public
Jackson County, Michigan
My commission expires June 10, 1981.