



**Consumers
Power
Company**

David J VandeWalle
Nuclear Licensing Administrator

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April 21, 1982

Dennis M Crutchfield, Chief
Operation Reactor Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555



DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - PROPOSED TECHNICAL SPECIFICATIONS CHANGE REQUEST -
INSTRUMENTATION AND CONTROL SYSTEMS

Attached are three (3) originals and thirty seven (37) conformed copies of a request for change to the Palisades Technical Specifications.

NRC letter dated April 16, 1981 resumed the evaluation of the RPS inoperable channel condition for the Palisades Plant. The referenced letter stated that long term operation of a four channel Reactor Protection System (RPS) and Engineered Safety Features Actuation System (ESFAS) in a 2 out of 3 logic configuration would be acceptable provided all four channels are sufficiently independent. The referenced letter therefore requested a review of RPS and ESFAS channel separation in order to demonstrate sufficient independency of all four channels, or as an alternative, an application for Technical Specification Change similar to the Calvert Cliffs and St Lucie Technical Specifications would be acceptable, provided that documentation of design similarity to that of Calvert Cliffs and St Lucie was included. NRC letter dated March 31, 1982, however, stated that a proposed Technical Specification change similar to the Calvert Cliffs Technical Specifications could be requested by Consumers Power Company without any further analyses or review of the protection system by either the NRC or Consumers Power Company.

Consumers Power Company letter dated July 27, 1981 expressed our decision to submit an application for change to the Palisades Technical Specifications. We hereby submit the appropriate Technical Specification changes.

April 5/11 w/check \$4,000

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The proposed change involves a single safety issue. Therefore, a check in the amount of \$4,000.00 is attached pursuant to 10 CFR 170.22, Class III change.



David J Vandewalle
Nuclear Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

ATTACHMENT

CONSUMERS POWER COMPANY
DOCKET 50-255
REQUEST FOR CHANGE TO THE TECHNICAL SPECIFICATIONS
LICENSE DPR-20

For the reasons hereinafter set forth, it is request 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. Replace Section 3.17.2 with the following:

"As a minimum, the Reactor Protection System instrumentation channels and bypasses shall be OPERABLE as defined in Table 3.17.1."

B. Add Section 3.17.3:

"As a minimum, the Engineered Safety Features instrumentation channels and bypasses shall be OPERABLE as defined in Table 3.17.2."

C. Add Section 3.17.4:

"In the event that the number of channels of a particular system listed in Table 3.17.3 "Other Safety Features Functions Instrumentation" 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."

D. Revise Section 3.17, Basis, paragraph three, to read as follow:

"When one of the four channels is taken out of service for maintenance, the protective system logic can be changed to a two-out-of-three coincidence by bypassing the removed channel for a limited time."

E. Replace Table 3.17.1 with revised Table 3.17.1, "Reactor Protective Instrumentation."

F. Replace Table 3.17.2 with revised Table 3.17.2, "Engineered Safety Feature Actuation System Instrumentation".

G. Replace Table 3.17.3 with revised Table 3.17.3, "Other Safety Feature Functions Instrumentation".

H. Delete Table 3.17.4.

II. DISCUSSION

The recommended Technical Specifications change, as prescribed by NRC letter dated April 16, 1981, is to allow a maximum of 48 hours of power operation with one channel of RPS and/or ESFAS in the "bypass" mode. In addition, the recommended changes provided for one channel to be placed in the "trip" mode indefinitely during which time a second channel could be placed in the "bypass" mode for a maximum of 48 hours.

Consumers Power Company acknowledges the requirement to establish a limit as to the length of time one channel of RPS and/or ESFAS can remain in the "bypass" mode. We consider, however, that a 48-hour limitation is unreasonable since it would prohibit most RPS and ESFAS failures from being effectively investigated and repaired according to responsible practices and procedures with the plant at power. As an example of a situation in which a 48-hour limitation would have a high probability of resulting in a needless plant shutdown, an instrumentation failure which could occur just prior to a weekend. A 48-hour repair in this circumstance may not be feasible given a temporary unavailability of certain skilled staff personnel, specialized test instruments or qualified replacement parts. Even if the failure was to occur early in the week, a 48-hour repair may be difficult. Certain skilled personnel may be off site for a number of days and/or specific test instruments may be off site for a number of days while being repaired and/or calibrated. In addition, the procurement and quality control processing of safety-related replacement parts often requires a number of days to complete.

As a reasonable alternative, Consumers Power Company is proposing a seven day limitation in lieu of the 48-hour limit recently granted to the St Lucie Plant. It is our opinion that in most instances, seven days would provide a reasonable opportunity to accumulate the required manpower, tools and parts to effect quality repairs without needlessly jeopardizing plant availability nor the health and safety of the public. Consumers Power Company, however, does consider as acceptable the 48-hour limitation for the manual RPS and ESFAS initiations and the 48-hour limitation for the situation in which one channel is placed in the "trip" mode indefinitely and a second channel is placed in the "bypass" mode.

It should be noted that the Action Statements for Tables 3.17.1 and 3.17.2 have excluded the requirement of placing an inoperable channel in trip or bypass within one hour. It is not possible to achieve the required action within one hour. Also, in Table 3.17.3, Item 2, HPSI flow instruments were deleted, as they perform no post-accident safety-related function, and no credit is taken for these instruments in accident analysis. This is the only "Functional Unit" requirement that has been eliminated from the Technical Specifications currently in effect.

DMCrutchfield, Chief
Palisades Plant
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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 4/21

R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 21st day of April, 1982.

Dorothy H. Bartkus

Dorothy H Bartkus, Notary Public
Jackson County, Michigan

My commission expires March 26, 1983.

(SEAL)