

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. CHANGES

- A. Revise Item (e) of Section 3.1.3 to read as follows:

"Primary coolant boron concentration shall not be reduced below cold shutdown boron concentration until after a steam bubble and normal water level are established in the pressurizer."

- B. Revise Section 3.6.1, Containment Integrity to read as follows:

- "a. Containment integrity shall be maintained unless the reactor is in the cold shutdown condition. During the refueling mode of operation, containment shall be maintained as specified by Specification 3.8.
- b. Containment integrity shall be maintained when the reactor vessel head is removed unless the boron concentration is greater than refueling concentration.
- c. Except for testing one rod at a time, positive reactivity changes shall not be made by control rod motion, or boron dilution to less than cold shutdown boron concentration unless containment integrity is maintained."

NOTE: Revised Technical Specification pages are attached. Proposed changes are shown by a vertical line in the right-hand margin.

II. DISCUSSION

The above proposed Technical Specifications are requested in order to provide agreement between the requirement of Specification 3.1.3e and the basis for this requirement. As stated in Consumers Power Company letter of clarification to TS 3.1.3e dated February 18, 1982, the intent of the specification is to preclude criticality unless normal pressurizer level has been established. The Specification 3.1.3e is stated presently in such a way that a number of desirable operations are either precluded or seriously hampered by this requirement.

In addition to the proposed Technical Specification change for Section 3.1.3e, it has been determined that a change to Specification 3.6.1 is appropriate in order to permit boron dilution (to cold shutdown concentration) without containment integrity being maintained.

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 Board have reviewed these changes and find them acceptable.

CONSUMERS POWER COMPANY

BY R B DeWitt 6/25

R B DeWitt, Vice President
Nuclear Operation

Sworn and subscribed to before me this 25 th day of June 1982.

Helen I. Dempski

Helen I. Dempski, Notary Public
Jackson County, Michigan

My commission expires December 14, 1983.