

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. Change Item (a) of Section 3.1.8 to read as follows:

"a. When the temperature of one or more of the primary coolant system cold legs is $\leq 250^{\circ}\text{F}$, or whenever the shutdown cooling isolation valves (MOV-3015 and MOV-3016) are open, two power operated relief valves (PORV's) with a lift setting of ≤ 400 psia, or a reactor coolant system vent of ≥ 1.3 square inches shall be operable except as specified below:

- (1) With one PORV inoperable, either restore the inoperable PORV to operable status within 7 days or depressurize and vent the PCS through a ≥ 1.3 square inch vent(s) within the next 8 hours; maintain the PCS in a vented condition until both PORVs have been restored to operable status.
- (2) With both PORVs inoperable, depressurize and vent the PCS through a ≥ 1.3 square inch vent(s) within 8 hours; maintain the PCS in a vented condition until both PORVs have been restored to operable status.

b. In the event either the PORVs or the PCS vent(s) are used to mitigate a PCS pressure transient, a Special Report shall be prepared and submitted to the Commission within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or vent(s) on the transient and any corrective action necessary to prevent recurrence."

B. To the existing Basis of Section 3.1.8 add the following:

"Basis

The OPERABILITY of two PORVs or an PCS vent opening of greater 1.3 square inches ensures that the PCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the PCS cold legs are $\leq 250^{\circ}\text{F}$. Either PORV has adequate relieving capability to protect the PCS from overpressurization when the transient is limited to either (1) the start of an idle PCP with the secondary water temperature of the steam generator $\leq 70^{\circ}\text{F}$ above the PCS cold leg temperatures or (2) the start of a HPSI pump and its injection into a water solid PCS. (1)

I. CHANGES (Con't)

B. (Con't)

Whenever the SCS is not isolated from the reactor coolant system, the PCS will be vented or the PORVs will be in service. This requirement will ensure that overpressurization of the SCS that could lead to a loss-of-coolant accident outside containment is prevented."

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

II. DISCUSSION

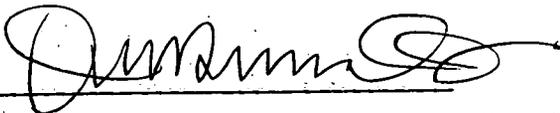
Overpressure relief capacity is required for the shutdown cooling system (SCS) when in operation; that is, when it is not isolated from the reactor coolant system. The proposed change clarifies the existing Specification to unambiguously require the PORVs to be in service when the SCS is not isolated from the reactor coolant system. This requirement will ensure that overpressure protection is available for SCS under all conditions.

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



J W Reynolds, Executive Vice President
Energy Supply

Sworn and subscribed to before me this 29th day of July 1982.



Helen I Dempski, Notary Public
Jackson County, Michigan

My commission expires on December 14, 1983.

