

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 Section 4.1.1.a.3 to read as follows:

"Performance of a channel calibration on the PORV actuation channel at least once per refueling cycle."

B. Replace Table 4.1.1 with the revised Table 4.1.1, "Minimum Frequency for Checks, Calibrations and Testing of Reactor Protective System".

C. Replace Table 4.1.2 with the revised Table 4.1.2, "Minimum Frequency for Checks, Calibration and Testing of Engineered Safety Feature Instrumentation Controls".

D. Replace Table 4.1.3 with the revised Table 4.1.3, "Minimum Frequency for Checks, Calibrations and Testing of Miscellaneous Instrumentation and Controls".

E. Revise the first sentence of Section 4.7.1.c to read:

" . . . at least once per refueling cycle during plant shutdown."

F. Revise the first sentence of Section 4.16.1.c to read as follows:

"At least once per refueling cycle . . . "

G. Revise the fifth paragraph of Section 4.16.1, Basis, to read:

" . . . shutdowns at least once per refueling cycle."

H. Revise Section 4.17.2.2.d to read:

"At least once per refueling cycle during shutdown, by . . . "

I. Revise Section 4.17.5.1 to read:

"Each of the penetration fire barriers shall be verified to be functional by a visual inspection at least once per refueling cycle and prior to declaring a penetration fire barrier functional following repairs or maintenance."

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

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II. DISCUSSION

The above proposed Technical Specifications changes are requested in order to prevent unnecessary plant shutdowns or the extension of outages for the sole purpose of performing Technical Specification Surveillance Tests. The Palisades Plant Surveillance Test Procedures (STP) identified in Attachment 1 are required to be performed on an 18-month cycle and during a cold shutdown condition. A few of the tests can be performed at hot shutdown and power operation; however, it is Consumers Power Company's position that conducting surveillance requirements for critical instrumentation and controls during these plant conditions can impact the safe operation of the plant.

Consumers Power Company requests that the testing frequency for the STPs identified in Attachment 1 be changed such that these STPs can be performed anytime during each refueling cycle. An 18-month cycle is insufficient in duration to allow for the performance of Surveillance Testing during refueling outages only, even if the  $\pm 25\%$  criteria is utilized. The primary reason for this is due to the fuel reload design which was implemented during the 1979-80 refueling outage. The Palisades Plant was modified from approximately a 7500 Megawatt-Day per ton cycle to approximately a 10,000 Megawatt-Day per ton cycle. This has resulted in approximately a five month extension to each fuel cycle.

With the equipment and component problems the Palisades plant experienced in the early stages of the current fuel cycle, the next refueling outage is now tentatively scheduled for August 13, 1983. This is  $23\frac{1}{2}$  months since the beginning of the last refueling outage (September 1980 to January 1981). The due dates for the STPs listed in Attachment 1 will all occur before the scheduled date of the next refueling outage. And in most cases, the  $\pm 25\%$  criteria will also be utilized prior to the next refueling outage. In order to perform these STPs when they are due, we would have to bring the plant down to a condition required to run the STPs. Putting the reactor through a shutdown transient just to perform these STPs is not considered justifiable.

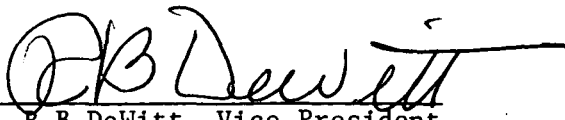
Consumers Power Company has reviewed the results of the last three surveillance tests performed on the instrumentation and controls identified in Attachment 1 and determined that all of the systems or components were operable. In addition, the deviation and event reports generated as a result of these tests did not indicate any trends for potentially reoccurring systematic problems. It is our position that permitting the surveillance testing intervals to be dependent on the length of the fuel cycle will not jeopardize the plant nor the health and safety of the public. The testing frequency proposed by this submittal is consistent with the testing frequencies stated in Consumers Power Company's letters dated August 30, 1982 and November 5, 1982 entitled "Proposed Technical Specifications Request - Engineered Safety Feature Filtration System".

III. CONCLUSION

Based on the foregoing, the Palisades Plant Review Committee has reviewed this change and found it acceptable. Also the Nuclear Activities Plant Organization has reviewed the change under the cognizance of the Nuclear Safety Board and found it acceptable.

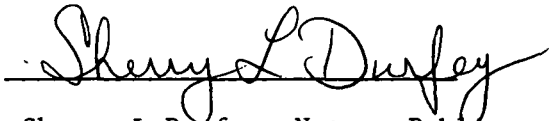
CONSUMERS POWER COMPANY

BY



R B DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 5th day of May 1983.



Sherry L Durfey, Notary Public  
Jackson County, Michigan

My commission expires on 11/5/86.

**SHERRY LYNN DURFEY**  
Notary Public, Jackson County, Mich.  
My Commission Expires Nov. 5, 1986

## ATTACHMENT 1

TECHNICAL SPECIFICATION (T/S) SURVEILLANCE PROCEDURES	APPLICABLE T/S SECTIONS	LAST 3 TIMES TEST WAS PERFORMED	EQUIPMENT OPERABLE OR PARAMETER MEETS THE APPLICABLE T/S SECTIONS	REMARKS (Significant Deviation and Event Reports Generated as a Result of the Tests)
Refueling Calibration of PCS Overpressure Protection	4.1.1.a.2	2/9/80 <sup>1</sup> 9/14/81	Yes Yes	
PCS Power Operated Relief Valves	4.1.1.a.4	12/4/79 11/2/81 11/09/81	Yes Yes	
Safety Channel Linear Power Drawer Calibration	Table 4.1.1.1.d	1/19/79 5/19/80 9/1/81	Yes Yes Yes	
Reactor Coolant Flow Channels Calibration	Table 4.1.1.3.b	4/10/78 9/26/79 9/16/81	Yes Yes	DR-PAL-78-013/3 Trip setpoints out of tolerance in the conservative direction
Thermal Margin/Low Pressurizer Pressure Channels Calibration	Table 4.1.1.4.b	9/16/79 11/2/80 9/10/81	Yes Yes Yes	
High-Pressurizer Pressure Channels Calibration	Table 4.1.1.5.b	4/11/78 9/17/79 9/14/81	Yes Yes Yes	DR-PAL-78-029/Instrument drift - A periodic activity control sheet written to increase surveillance DR-PAL-80-089. The age of PT-0102D caused normal instrument drift
Steam Generator Level	Table 4.1.1.6.b	4/10/78 11/29/79 11/12/81	Yes Yes Yes	DR-PAL-78-035/Instrument drift of LT-0752B apparent zero shift of ~1.5%. Past tests do not show any systematic negative shift. DR-PAL-81-188/ Several instruments were found out of specified tolerances incorporated into latest test revision.

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Low-Pressure SIS Initiation Logic	Table 4.1.2.1.b Table 4.1.2.2.a	3/2/78 9/21/79 9/20/81	Yes Yes Yes	
Engineered Safeguards System	Table 4.1.2.3.b Table 4.1.2.6.a Table 4.1.2.11.b	4/8/78 5/7/80 12/21/81	Yes Yes Yes	DR-PAL-80-091/Whole system operated as it was designed to except the B charging pump did not start on by-pass flow.
Containment Area Monitor Calibration	Table 4.1.2.5.b <sup>2</sup> Table 4.1.3.4.b <sup>2</sup>	4/26/78 11/7/79 4/29/81	Yes Yes Yes	Test results only pertain to the Containment Isolation Monitors. The Containment High Range Monitors have not been declared operational.
Containment High Radiation Test	Table 4.1.2.5.d <sup>3</sup> Table 4.1.2.7.a <sup>3</sup> Table 4.1.2.7.b <sup>3</sup>	4/15/78 5/3/80 11/28/81	Yes Yes Yes	
Containment High- Pressure Spray System Tests	Table 4.1.2.4.b Table 4.2.2.b Table 4.2.2.13.c 4.6.1.a 4.6.5.a 4.7.1.b	4/2/78 4/27/80 11/30/81	Yes Yes Yes	The 4/27/80 test had to be performed twice. CV-0437A and CV-043B failed to open because the testors did not wait long enough for the time delay to time out. This portion of the test was re-run and valves operated satisfactorily. Also, the right channel SIS alarm did not function properly however, the alarm serves no safety function.

<sup>2</sup> This section was changed to 4.1.3.4.a.b and 4.1.3.4.b.b by our T/S Change Request dated 11/5/82.

<sup>3</sup> This section was changed to 4.1.3.4.b.d by our T/S Change Request dated 11/5/82.

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SIRW Tank Level Switch Interlocks Test	Table 4.1.2.12	2/28/78 5/6/80 9/22/81	Yes Yes Yes	
Safety Injection Tank Pressure Channel Calibration	Table 4.1.2.13.b	9/16/79 12/1/80 12/5/81	Yes Yes Yes with exceptions	DR-80-214/Equipment operable but "as found" values were slightly over tolerance. It was deemed appropriate to change the T/S Surveillance Test.  During the 1981 refueling outage, not all of the test data met the acceptance criteria, however, major modifications were well under way in panel C-13.
Safety Injection Tank Pressure Switch Calibration	Table 4.1.2.13.b	9/16/79 11/11/80 9/15/81	Yes Yes Yes	
Safety Injection Tank Level/Channel Calibration	Table 4.1.2.13.b	9/16/79 12/4/80 12/22/81	Yes Yes Yes	DR-PAL-79-125/Level indications and alarms out of tolerance. Alarm settings drifted in the conservative direction.
Main Steam Isolation Valve Circuit Test	Table 4.1.2.16.b	4/1/78 3/14/80 12/6/81	Yes Yes Yes	
SIRW Tank Temperature Indicator Calibration	Table 4.1.2.17.b	8/1/79 11/5/80 9/1/81	Yes Yes Yes	

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Control Rod Calibration	Table 4.1.3.2.c Table 4.1.3.3.c	3/17/78 1/20/80 11/20/81	Yes Yes Yes	
Pressurizer Level Channel Calibration	Table 4.1.3.7.b	10/2/79 12/9/80 9/19/81	Yes Yes Yes	DR-PAL-78-019/Transmitter drifted causing a 1-2% error. Past history shows drift limited to ~2%. No further action taken. DR-PAL-81-008/The acceptance criteria is violated for "as found" values on some of the units because of compensation incorporated to allow for static working pressure calibration shifts.
Control Rod Drive System Interlocks	Table 4.1.3.8.a Table 4.1.3.8.b	12/18/81 5/9/82 8/13/82	Yes Yes Yes with exceptions	DR-PAL-82-120/The automatic and withdrawal prohibit alarm did not occur or reset within the proper tolerance, however, auto rod motion is administratively prohibited.
Automatic Rod Withdrawal Prohibit Interlock Matrix	Table 4.1.3.8.a Table 4.1.3.8.5	12/5/81 5/11/82 8/11/82	Yes Yes Yes	
Steam Generator Feedwater Flow Instrument Loop Calibration	Table 4.1.3.10	9/13/79 11/9/80 9/20/81	Yes Yes Yes	

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Containment Humidity	Table 4.1.3.11	9/22/79 11/11/80 11/19/81	Yes Yes Yes	DR-PAL-79-123/HT-1812 failed; transmitted, repaired and re- calibrated. HT-1813, 1814 and 1815 tubes replaced following 11/11/80 test.
Narrow Range Pressure Indication/Shutdown Cooling Line Interlock Calibration	Table 4.1.3.12	10/9/79 11/21/80 9/11/81	Yes Yes Yes	
Containment Service Water Break Detector	Table 4.1.3.13	9/10/79 1/21/81 11/16/81	Yes Yes Yes	DR-PAL-81-009/Equipment was operable but out of calibration. It required a larger differ- ential pressure to actuate alarm.
Subcooled Margin Monitor Surveillance	Table 4.1.3.18.b	12/7/81 <sup>1</sup>	Yes	
Containment Hydrogen	Table 4.1.3.22.b	Has not been performed		
Diesel Generator Inspection <sup>4,5</sup>	4.7.1.c	10/21/81, 11/20/81 <sup>1</sup> 10/2/81, 11/8/81	Yes Yes	
Function Test Seismic Hydraulic Restraints	4/16/1	3/8/78 3/5/80 11/27/81	Yes Yes Yes	

<sup>4</sup> Two surveillance procedures.

<sup>5</sup> The inspections are routinely performed in the Preventative Maintenance Program.



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Inspection and Preventive Maintenance of Fire Pump Diesels	4.17.2.2.d	10/10/79 5/7/80 12/6/81	Yes Yes Yes	
Penetration Fire Barriers Surveillance	4.17.5.1	4/18/80 <sup>1</sup>  12/15/81	Yes with exceptions  Yes with exceptions	ER-080-018/During inspection of fire barriers bottom side of penetration H0-12 was missed  The penetrations were open for modifications in progress - A fire watch was stationed.