

CONSUMERS POWER COMPANY

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT

REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS

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)

The following technical specification changes are due to the fire protection modification projects and clarifications associated with compliance to Appendix R of 10CFR50.48. Affected Technical Specification sections include: Section 3.22.1.1, Table 3.22.1, Section 3.22.3.1, Section 3.22.5, and Section 4.17. Included in these proposed changes are broader criteria concerning fire rated assemblies which resulted in total revision to Sections 3.22.5 and 4.17. Revised Technical Specification pages are attached with proposed changes identified by a vertical line in the right-hand margin. All changes to Section 3.22.1 and Section 3.22.3 are made with reference to an existing revision submitted, November 19, 1984 but not yet incorporated into the present Technical Specifications. All changes made in that revision are prerequisite to including changes provided herein. The following are brief descriptions of all proposed changes:

Specification 3.22.1.1: Clarify statement to read: "The minimum fire detection instrumentation..."

Specification 3.22, Table 3.22.1: The first item has been clarified to include better description of zone affected by detector.

Specification 3.22, Table 3.22.1: The second item has been expanded to show fire protection zones along with appropriate number and type of detection instrumentation in that zone. (New Item No 2-6, Old Item No 2)

Specification 3.22, Table 3.22.1: Clarified item in table pertaining to fire protection zone "Turbine Building 590, Col H-9" to read: "Southwest Cable Penetration, Col H-10." (New Item No 9, Old Item No 5)

Specification 3.22, Table 3.22.1: Revised Intake Structure zone description by adding instrument location. (New Item No 10, Old Item No 6)

Specification 3.22.3.1: New item "j" has been added to account for sprinkler system in Charging Pump Room.

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Specification 3.22.5: This specification was totally revised to include all fire rated assemblies and fire protection assemblies along with penetration sealing devices.

Specification 4.17.4.1 & 4.17.4.2: Corrects alpha characters for consistency with Specification 3.22.4.1.

Specification 4.17.5.1 & 4.17.5.2: New surveillance requirements are outlined reflecting the proposed revision to Specification 3.22.5.

## II. Discussion

The above proposed changes to the Technical Specifications are requested in order to achieve closer conformance to the overall Facility Fire Protection Program.

Since the charging pumps are equipment important to safe shutdown, the Fire Suppression System for the Charging Pump Rooms must be operable. Consequently, this system needs to be added to Specification 3.22.3 and to Specification 3.22, Table 3.22.1.

According to 10CFR50.48, which endorses Branch Technical Position 9.5-1, Specification 3.22.5 and 4.17 had to be revised to include all fire related assemblies. This requirement was combined with the necessity of including fire protection assemblies (radiant heat shields) as a technical specification. These additions better represent the fire protection surveillance programs presently in effect at Palisades.

### Basis for Determination of No Significant Hazards Consideration

We have reviewed the proposed change to the Palisades Technical Specifications being made in accordance with the requirements of 10CFR50.48 in order to determine whether or not this change involves a significant hazards considerations. In our review, we have used the guidance of certain examples (48FR14870). One of the examples (ii) in this guidance is if a change constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications, than that change can be considered not likely to involve significant hazards considerations. Since this proposed change adds requirements to be in compliance with 10CFR50.48, we have determined that this change falls within the example and therefore the change does not involve a significant hazards consideration.

III. CONCLUSION

The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question and therefore involves no significant hazards consideration. This change has also been reviewed under the cognizance of the Nuclear Safety Board. A copy of this Technical Specification Change Request has been sent to the State of Michigan official designated to receive such Amendments to the Operating License.

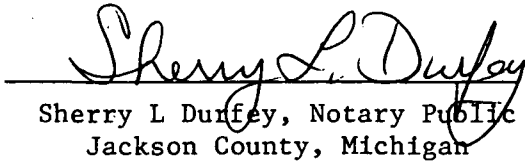
CONSUMERS POWER COMPANY

By



R B DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 5th day of February 1985.



Sherry L Durfey, Notary Public  
Jackson County, Michigan

My commission expires November 5, 1986.

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