



**Consumers  
Power  
Company**

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

February 5, 1985

Director,  
Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - PROPOSED TECHNICAL SPECIFICATION CHANGE REQUEST - MINIMUM  
CONDITIONS FOR CRITICALITY

Attached are three (3) originals and thirty-seven (37) conformed copies of a Request for Change to the Palisades Technical Specifications. The attached proposed change to the Palisades Technical Specifications provides clarification to the existing Technical Specification 3.1.3.(c). The proposed change establishes a time constraint of 15 minutes for compliance with Technical Specification 3.1.3(c), which reflects reasonable operations considerations. With the reactor critical and the primary coolant temperature below 525°F, the proposed change allows increased operator flexibility by precluding the necessity of immediately bringing the reactor subcritical by control rod insertion. The proposed change is consistent with CE Standard Technical Specifications.

A check in the amount of \$150.00 is enclosed as required by 10CFR170.21.

*David J. Vandewalle*  
David J. Vandewalle

Director of Nuclear Licensing

CC Director, Office of Nuclear Reactor Regulation  
Director, Office of Inspection and Enforcement  
NRC Resident Inspector - Palisades

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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

Change Technical Specification 3.1.3(c) to read as follows:

- c) With the primary coolant temperature below the minimum temperature specified in "a" above, restore the primary coolant temperature to within its limit within 15 minutes, or the reactor shall be subcritical by an amount equal to or greater than the potential reactivity insertion due to depressurization within the next 15 minutes.

II.    DISCUSSION

Technical Specification 3.1.3, Minimum Conditions for Criticality, establishes a minimum temperature of 525°F for the Primary Coolant System as a requirement for reactor criticality during normal operation. Technical Specification 3.1.3 further requires that with the primary coolant temperature below 525°F, the reactor shall be subcritical by an amount equal to or greater than the potential reactivity insertion due to depressurization. Contrary to CE Standard Technical Specifications, however, the current Palisades Technical Specifications do not specify a time interval for compliance.

The above proposed change to the Palisades Technical Specifications provides a reasonable time interval for compliance with Technical Specification 3.1.3(c), and is consistent with CE Standard Technical Specifications. Additionally, the proposed change will preclude the necessity of immediately bringing the reactor subcritical by insertion of control rods, which may result in a further temperature decrease.

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Basis for Determination of No Significant Hazards Considerations

We have reviewed the proposed change to allow a 15-minute time constraint for compliance with Technical Specification 3.1.3(c) in order to determine whether or not this change involves a significant hazards consideration. 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 Specification, then that change can be considered not likely to involve significant hazards considerations. Since this proposed change adds a 15-minute requirement to 3.1.3(c) which is more limiting than the generic LCO under 3.0.3 which allows one (1) hour, 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.

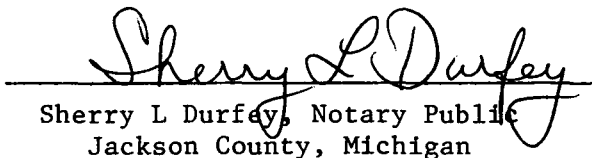
CONSUMERS POWER COMPANY

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