



**Consumers
Power
Company**

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
PROPOSED TECHNICAL SPECIFICATION CHANGE REQUEST -
PALISADES REACTOR PRESSURE VESSEL PRESSURE/TEMPERATURE LIMITS

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 Palisades Technical Specifications 3.1.2 and 3.1.3 provides new Palisades reactor vessel pressure-temperature limits for heat-up and cooldown and hydrostatic test due to the expiration of the current pressure temperature limits.

The new limits reflect findings which establish the actual vessel weld chemistries, and are based on the regulatory position for prediction of reference temperature shift contained in Regulatory Guide 1.99, Revision 2. Attachment II to the Technical Specifications Change Request entitled "Engineering Analysis, Palisades Reactor Pressure Vessel Pressure/Temperature Limits Determination" describes the development of the revised pressure/temperature limits using Regulatory Guide 1.99, revision 2 methodology for determining adjusted reference temperatures. This methodology is considered applicable and conservative for prediction of the effects of irradiation of Palisades reactor vessel materials in that the limitations in regulatory position C.1 of the guide are met. With regard to nominal irradiation temperature in C.1, Palisades Technical Specifications prohibit critical operations (other than for startup physics testing) with reactor coolant temperature less than 525°F, and nominal downcomer coolant temperatures during power operations currently range from 532°F to 537°F.

Attachment III to the Technical Specifications Change Request entitled "Summary of Findings Relative to Palisades Plant Reactor Vessel Material" supports the use of chemistry data from sources outside the Palisades Plant reactor vessel surveillance program in determining the adjusted reference temperatures for comparison with proposed NRC pressurized thermal shock (PTS) screening criteria and for developing primary coolant system pressure/temperature limits. This report concludes that based upon the NRC proposed

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Director, Nuclear Regulatory Reactor
Palisades Plant
TSCR - Pressure/Temperature Limits
June 14, 1985

2

PTS rule evaluation procedures, the Palisades welds will not exceed the screening criteria before projected end of plant life.

Consumers Power Company has reviewed 10 CFR 50 Appendix H as it relates to development of an "integrated surveillance program" and it is our understanding that such a program of this type is intended to allow for sharing of surveillance program results by a set of reactors of similar design and operating features such that the scope of individual plant vessel material surveillance programs may be reduced. We do not see that this program was intended to address the situation with the Palisades program in which surveillance program data from other plants more realistically reflects both the chemical and material properties of the Palisades Plant reactor vessel welds than does the Palisades surveillance program data. However, we recognize that in order to take advantage of credible surveillance data from sources outside the Palisades Plant reactor vessel surveillance program in establishing actual adjusted reference temperatures for the Palisades vessel (as opposed to predicted reference temperatures in accordance with Regulatory Guide 1.99, Revision 2 formuli), it will require development of appropriate justification of an "integrated" surveillance program. We are reviewing the necessity and benefits of such a program and request your views on this matter as well. Since the existing Technical Specification limits are currently projected to expire during the latter part of August 1985, your expedited review and approval of this change is requested.

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



David J Vandewalle
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CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachments