

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 15, 1972, for the Palisades Plant be changed as described in Section I below:

I. Changes

- A. Add new section 3.25 "ALTERNATE SHUTDOWN SYSTEM;" LIMITING CONDITION FOR OPERATION including section 3.25.1, Applicability and Action Statements and Basis.
- B. Add new Table 3.25.1 "ALTERNATE SHUTDOWN MINIMUM EQUIPMENT."
- C. Delete existing Section 4.7.3 and replace with new Section 4.7.3 "EMERGENCY LIGHTING" SURVEILLANCE REQUIREMENTS including Sections 4.7.3.1, 4.7.3.2 and Basis.
- D. Add new Section 4.20 "ALTERNATE SHUTDOWN SYSTEM," SURVEILLANCE REQUIREMENTS including Sections 4.20.1 and 4.20.2.
- E. Add new Table 4.20.1 "ALTERNATE SHUTDOWN MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS."

II. Discussion

The above proposed Technical Specification Changes add operability and surveillance requirements for the Alternate Shutdown System and add additional surveillance requirements for the plant emergency lighting. The alternate shutdown system has been installed in accordance with 10CFR50 Appendix R, Sections III.G.3 and III.L. The system functional design was reviewed and approved in the NRC Safety Evaluation of May 26, 1983. The requirements are based on applicable portions of the draft Standard Technical Specifications. The equipment represents that equipment required to bring the plant to safe shutdown after a fire in the control room, cable spreading room, engineered safeguards panel room, or the corridor between the charging pump and switchgear room 1C. With completion of the Alternate Hot Shutdown Panel and use of procedures to take the plant to cold shutdown, the plant will be in compliance with all requirements of 10CFR50.48 and 10CFR50 Appendix R.

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Analysis of No Significant Hazards Consideration

The Alternate Hot Shutdown Panel has been installed to meet the requirements of 10CFR50 Appendix R. This panel provides an alternate means of initiating and controlling feedwater addition to attain and maintain hot shutdown via the turbine driven Auxiliary Feedwater Pump in the event that a fire results in the loss of control from the main control room. This system is separate from and redundant to the normal control of the turbine driven Auxiliary Feedwater Pump provided in the control room. Should a fire in the Alternate Hot Shutdown Panel result in the loss of control of the normal auxiliary feedwater injection path, hot shutdown could be achieved by using the third Auxiliary Feedwater pump which provides a separate injection path to the steam generators. Therefore, since a postulated fire cannot completely disable control of auxiliary feedwater, the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated has not been increased nor has the possibility of an accident or malfunction of a different type than any previously evaluated been created.

The proposed Technical Specifications for the Alternate Hot Shutdown Panel provide Limiting Conditions for Operation and the necessary Applicability, Action and Basis statements for the Alternate Hot Shutdown Panel and do not alter the basis for any other Technical Specification. Therefore the margin of safety as defined in the Technical Specifications has been enhanced by the addition of an alternate means of bring the plant to hot shutdown.

The proposed Technical Specifications relative to the Emergency Lighting System provide additional surveillance requirements for the emergency lighting units. The proposed changes to the Emergency Lighting section provide an expanded basis statement and a new Surveillance Requirements section. These changes are primarily editorial in content and result in a clearer description of the basis for, and the operability and surveillance requirements for the Emergency Lighting Systems.

The proposed changes in the Technical Specifications for the Emergency Lighting Systems do not involve a significant change in the current basis statements for the Emergency Lighting Systems nor do they affect any other Technical Specification. Therefore, based on the foregoing the probability or the consequences of an accident or malfunction of equipment important to safety previously evaluated has not been increased, the possibility of an accident or malfunction of a different type than any evaluated previously has not been created, and the margin of safety defined in the basis for any other Technical Specification has not been reduced.

III. Conclusion

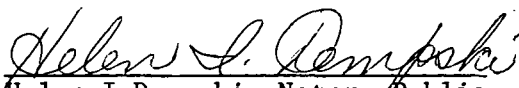
The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question and therefore involves no significant hazards consideration. This change has also been reviewed under the cognizance of the 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 21st day of November 1985.



Helen I Dempski, Notary Public
Jackson County, Michigan

My commission expires October 12, 1987.

