

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. Delete asterisk from Technical Specification 3.3.1(b) and delete corresponding footnote at bottom of page.
- B. Delete asterisk from Technical Specification 3.3.3 and delete corresponding footnote at bottom of page.
- C. Delete words "at MCC9" from Technical Specification 3.3 Basis, located in the next to last paragraph.
- D. Revise wording of Technical Specification Table 4.1.2, Item 19, under Surveillance Method to: "...Then lock open breakers and control power key switches."

II. Discussion

- A. The asterisk and footnote may be deleted since the footnote was only applicable to cycle 5 operation.
- B. The asterisk and footnote may be deleted since the effective date for initial implementation has passed.
- C. The breakers are no longer located at MCC-9, rather, they are located at MCC 21, 22, 23, and 24. Specifically stating the MCC number is considered unnecessary information.
- D. MCC-9 is an incorrect informational reference (refer to C above). The change in wording merely corrects and clarifies the existing wording.

Analysis of No Significant Hazards Consideration

The changes are administrative, deleting out of date footnotes and references to an incorrect motor control center. The incorrect references to MCC-9 are due to modifications to the 480 V breakers for the safety injection motor operated valves. The correct breakers are now in MCC-21, 22, 23 and 24. PRC has concluded that the specific location descriptor is unnecessary in either the basis statement or Table 4.1.2. Since the proposed changes have no impact on actions

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required by the Technical Specifications there is no increase in the probability of occurrence or consequences of an accident. Furthermore the possibility of a new or different kind of accident has not been created and the margin of safety has not been affected by these administrative changes.

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
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 19th day of December 1985.

Elaine E Buehrer
Elaine E Buehrer, Notary Public
Jackson County, Michigan
My commission expires October 31, 1989