

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. Change(s)

- A. Add the following at the end of section 3.4.1b.

"Diesel Fire Pump	K5/P9B
Diesel Fire Pump	K10/P41"

- B. Delete section 3.4.1c and add new 3.4.1c as follows:

"c. The service water inlet temperature is less than or equal to 53°F."

- C. Add paragraph 3.4.6 as follows:

"With service water inlet temperature greater than 53°F, the reactor shall be placed in hot shutdown within 12 hours and cold shutdown within an additional 24 hours."

- D. Add paragraph at end of Basis to section 3.4 as follows:

"Limitations have been imposed on the Service Water System inlet temperature and on the operability of diesel driven fire pumps. These limitations are required to insure adequate heat removal occurs for critical service water loads when only one diesel generator is operating."

- E. Add new section 4.6.4 as follows:

"4.6.4 Service Water Inlet Temperature

With the service water inlet temperature less than or equal to 51°F, the water temperature shall be monitored at least once per 12 hours.

With the service water inlet temperature greater than 51°F, the water temperature shall be monitored at least once per two hours."

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- F. Add paragraph at end of Basis to section 4.6 as follows:

"The service water inlet temperature is monitored periodically to ensure that adequate heat removal capability will be available for critical service water loads.

II. Discussion

- A. The change includes requirements for the diesel fire pumps that are consistent with the service water pumps. The diesel fire pumps will be used to augment flow in a postulated event which includes a LOCA, loss of offsite power and failure of the 1-2 diesel generator. The fire system is a non-safety grade system, but it is designed to meet certain requirements detailed in Attachment 4 that justify its use for postulated events where they will be required to operate.
- B. The evaluation and justification for the service water inlet temperature is detailed in Attachment 3. Removal of the old section 3.4.1c is an editorial revision. The same requirements are included in section 3.4.4.
- C. The LCO proposed in paragraph 3.4.6 is consistent with the similar LCO action statement in section 3.4.3 and other areas in the Technical Specifications.
- D. The addition to Basis section 3.4 is self explanatory.
- E. The service water inlet temperature surveillance proposed in section 4.6.4 is more restrictive than the STS (for Ultimate Heat Sink) which requires 24-hour verification as opposed to our 12-hour proposal. Additionally we have imposed more stringent requirements when the water temperature closely approaches the operating limit.
- F. The addition to Basis section 4.6 is self explanatory.

Analysis of No Significant Hazards Consideration

This change to the Technical Specifications imposes additional requirements for containment cooling by limiting service water inlet temperatures and requiring operable diesel fire pumps. This change also includes certain previously proposed items related to spray header water level and deletion of V-4A, which will not be represented in this evaluation.

This change does not result in an increase in the probability or consequences of an accident or malfunction. The additional restrictions provided for service water temperature and diesel fire pumps will ensure that the probability or consequences will remain as previously analyzed.

These changes do not create the possibility of an accident or malfunction of a different type. The additional restrictions have been provided to ensure that the Service Water System heat removal will attain the minimum values needed for previously evaluated accidents.

The margin of safety provided by the Technical Specifications will not be reduced by these changes. The additional restrictions for service water inlet temperature and diesel fire pumps results in an enhancement to safety.

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
Energy Supply Services

Sworn and subscribed to before me this 2nd day of December, 1986.


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