



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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March 9, 1987

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATIONS CHANGE REQUEST REVISION -
FIRE DETECTION INSTRUMENTS

Attached is a revision to a previously proposed Technical Specifications Change Request. Consumers Power submittal of November 21, 1985, corrected November 22, 1985, provided revised proposed changes which superceded a portion of our November 19, 1984, proposed change on Control Room Habitability and the entire proposed change of February 5, 1985, Inspection and Testing of Fire Protection Devices and Assemblies. This submittal revises Table 3.22.1 Fire Detection Instrumentation from the November 21 and 22, 1985, submittals. The revisions include removal of several water flow switches from the table and adds ultraviolet detectors in the intake structure.

A check in the amount of \$150 was enclosed with our February 5, 1985, Technical Specifications Change Request, thus, no check is attached.

James L. Guerin for KWBerry

Kenneth W Berry
Director, Nuclear Licensing

CC Administrator, Region III, NRC
NRC Resident Inspector - Palisades

Attachment

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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

Replace Table 3.22.1, Fire Detection Instrumentation with the revised table provided as an attachment to this letter.

II. DISCUSSION

Consumers Power Company submitted proposed Technical Specifications related to fire protection requirements in letters dated November 21 and 22, 1985. Included within the proposal was a revised Table 3.22.1 for fire detection instrumentation. Since that letter, certain changes have been identified as necessary for Table 3.22.1. These changes are provided herein and supersede any prior versions of Table 3.22.1.

This change eliminates all but two water flow switches from Table 3.22.1. The Palisades Fire Hazard Analysis takes credit for water flow switches located in the diesel generator rooms only. Therefore, since no safety related function is provided by the other switches, a Technical Specification for them is not considered to be necessary or appropriate.

With the exception of water flow switches, this proposal includes all other additions provided in the November 22, 1985 letter. These items were added to reflect physical additions to the Auxiliary Building which were completed to facilitate the Control Room Emergency Air Cleanup System.

In addition to the earlier changes, new fire detection instruments have been added to Table 3.22.1 for the intake structure. These instruments were added as a result of concerns identified during the NRC Fire Protection Inspection

Analysis of No Significant Hazards Consideration

This change revision removes all water flow switches from Technical Specification fire detection instrumentation except those mentioned in the Fire Hazards Analysis. In addition, this revision adds the ultraviolet detection system to the Technical Specifications. This system was installed in the intake structure as a result of issues identified in the NRC Appendix R inspection.

This change does not result in an increase in the probability or consequences of an analyzed accident. The Fire Hazards Analysis does not require the use of the deleted fire flow switches. The addition of the ultraviolet detection results in improved detection and, therefore, enhances safety.

This change does not create the possibility of a different accident or malfunction. The flow switches were not used in the Fire Hazards Analysis. Therefore, flow detection by the switches should not affect safety. The addition of the ultraviolet detection system results in additional controls and, therefore, only improves plant safety.

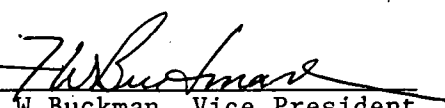
The margin of safety defined in Technical Specifications is not reduced by this change. Since the water flow switches are not utilized in the Fire Hazards analysis, their availability is not considered an enhancement of the margin of safety. The ultra violet detection system is an additional method of fire detection and improves the margin of safety.

III. CONCLUSION

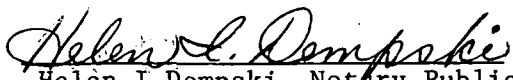
The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question and therefore involves no significant hazards consideration. This change has also been reviewed under the cognizance of the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


F W Buckman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 9th day of March 1987.


Helen I Dempski, Notary Public
Jackson County, Michigan

My commission expires October 12, 1987