



**Consumers  
Power**

**POWERING  
MICHIGAN'S PROGRESS**

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March 10, 1987

Nuclear Regulatory Commission  
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Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
TECHNICAL SPECIFICATIONS CHANGE REQUEST - RETS CORRECTIONS

Attached are proposed changes to the Palisades Technical Specifications. The changes provide clarifications and editorial corrections to the Radiological Effluent Technical Specifications (RETS) approved in Amendment No 85. In Licensee Event Report 86-037, Consumers Power identified two discrepancies in RETS concerning the Hi Range Noble Gas Monitor annunciation and continuous sampling of the service water effluent. In the LER, Consumers Power committed to submit clarifications and corrections to the Technical Specifications. This submittal fulfills that commitment.

Pursuant to 10 CFR 170.12(e), an application fee of \$150.00 is attached.

*Kenneth W Berry for*

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. CHANGES

A. In Table 3.24-1, change Item 4 to read as follows:

"4. CONTINUOUS COMPOSITE SAMPLERS (Alarm/Trip Setpoint are not applicable)

- |   |     |     |
|---|-----|-----|
| a. Turbine Building Sumps Effluent Line | (1) | 30  |
| b. Service Water System Effluent        | (1) | 30" |

B. In Table 4.2.1, delete the sampling test for gas radioactivity by the air ejector gas monitor as listed in Item 7. Also, delete the corresponding footnote 5 from this table.

C. In Table 4.2.1, delete Items 8, 9 and 10. Also, delete the associated footnote 4 from this table.

D. In Table 4.24-1, add Item 5 to read:

"Instrument	CHANNEL CHECK	SOURCE CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST
5. SERVICE WATER SYSTEM EFFLUENT COMPOSITE SAMPLER	D(4)	NA	NA	NA"

E. In Table 4.24-2, change Table Notation (2)a. to read:

"a. Instrument indicates measured levels above the alarm set point (not applicable for Item 3.d, Hi Range Noble Gas)."

II. DISCUSSION

A. This change adds a continuous composite sampler for the service water system effluent to the list of effluent monitoring instruments provided in Table 3.24-1. This addition is necessary for consistency with Table 4.24-3 which implies that a composite sampler is available. Also, the addition of the sampler to Table 3.24-1

provides an appropriate action to be taken in the event of an inoperable service water system effluent composite sampler. The action statement provides for a grab sample to be taken on a daily basis. As discussed in LER 86-037, a continuous composite service water sampler does not now exist. Consumers Power Company has committed to install a sampler and the modification is expected to be completed by July 31, 1987. Until that time, the alternate grab sample in the action statement will provide a method to meet the specification.

- B. This change eliminates a redundant requirement from Table 4.2.1 and removes corresponding footnote 5. The equivalent sample requirement is provided by Item 2 of Table 3.24-2. This change is editorial and was overlooked during the implementation of the RETS.
- C. The sample requirements provided by Items 8, 9 and 10 on Table 4.2.1 are equivalent to those provided in Table 4.24-3 for liquid waste batch releases, Table 4.24-5 for a radioactive gas release and Table 4.24-5 for stack gas particulate samples. Therefore, Items 8, 9 and 10 and the corresponding footnote 4 should be deleted. This change is editorial and was overlooked during the implementation of the RETS.
- D. The service water system effluent composite sampler has been added to Table 4.24-1 to require periodic checks of the equipment's operating status.
- E. An exception has been added for the Hi Range Noble Gas Monitor for control room annunciation if the instrument indicates measured levels above the alarm setpoint. This instrument does not have this capability, nor was the instrument expected to perform this function.

The alarms provided by the normal range monitor are used to signal the need for emergency actions. Effluents are closely monitored once an alarm is received, so any further alarms from higher rates of release are unnecessary. Therefore, the alarm function is not provided for the Hi Range Noble Gas Monitor and an exception should be provided for this item.

#### Analysis of No Significant Hazards Consideration

These changes are administrative. Sampling of the service water discharge is being clarified, editorial corrections from Technical Specification Amendment 85 are being made and the requirement for quarterly testing of the Hi Range Noble Gas Monitor high alarm annunciator is being removed as no high alarm annunciator exists.

A continuous service water system composite sampler does not presently exist at Palisades. Plans are for installation by July 31, 1987. Historically, daily grab samples of the service water effluent have

provided a method for determining if radioactive material is entering the service water system. This grab sample will continue to be the sampling method until the continuous sampler is installed. In processing the RETS, an apparent omission was made in not clarifying the method of service water effluent sampling.

The Hi Range Noble Gas Monitor (RIA 2327) was incorrectly noted on Technical Specification Table 4.24-2 as requiring the high alarm control room annunciator to be tested. There is no high alarm annunciator from the monitor. This will not affect the consequences of an accident as the Hi Range Noble Gas Monitor is part of an integrated system with the Normal Range Noble Gas Monitor (RIA 2326). The alert or high alarms on the Normal Range Monitor (RIA 2326) will initiate Emergency Plan classifications and actions to continuously monitor effluents. Therefore, another alarm has no value.

The service water sampling via a grab sample, corrections to the functional test, alarm surveillance of the Hi Range Noble Gas Monitor, and other changes are essentially administrative and are requested to clear up discrepancies in the specifications that resulted from implementation of the Radiological Effluent Technical Specifications Amendment. The changes do not increase the probability or consequences of an accident nor create the possibility of an accident or malfunction of a different type than previously evaluated. Furthermore, no margin of safety as defined in the basis for any technical specification is affected by these administrative changes.

### III. Conclusion

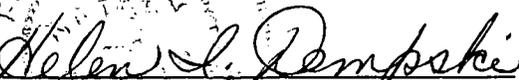
The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question and therefore involves no significant hazards consideration. This change has also been reviewed under the cognizance of the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

  
 J W Reynolds, Executive Vice President  
 Energy Supply

Sworn and subscribed to before me this 10th day of March 1987.

  
 Helen I Dempski, Notary Public  
 Jackson County, Michigan

My commission expires October 12, 1987

ATTACHMENT

Consumers Power Company  
Palisades Plant  
Docket 50-255

PROPOSED TECHNICAL SPECIFICATIONS PAGE CHANGES

March 10, 1987

5 Pages