

CONSUMERS POWER COMPANY
Docket 50-255
Request for Change to the Provisional Operating
License DPR-20

For the reasons hereinafter set forth, it is requested that 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

- A. Delete Items 2.B. and 2.C. in the Provisional Operating License and add new Items 2.B and 2.C; add new item 2.D. and renumber old Item 2.D. as 2.E. Items 2.B., 2.C., 2.D. and 2.E. to read as on attached page changes.

II. Discussion

By letter dated January 24, 1975, (Big Rock Point, Docket No 50-155), the NRC requested that licensees provide: (1) proposed amendments to the conditions of existing Facility Operating Licenses which relate to the receipt, possession, and use of byproduct, source, and special nuclear materials; (2) proposed Technical Specifications changes which provide for leakage testing and the related surveillance and reporting requirements for miscellaneous radioactive material sources; and (3) additional information as described in Regulatory Guide 1.70.3, "Additional Information, Radioactive Materials Safety for Nuclear Power Plants," to be included in a revision to the FSAR. The NRC letter (also docketed with other utilities, e.g., Omaha Public Power District, Fort Calhoun Docket No. 50-285, AEC letter December 16, 1974.) included a standard license format and guidelines for the requested proposals. Though the NRC letter was inadvertently omitted from the Palisades docket, the applicability of the proposed simplification of the licensing process to Palisades is apparent.

The objective of the NRC's letter was to add flexibility to the operation of nuclear power plants by establishing a more generalized approach to the licensing of byproduct, source, and special nuclear materials. This objective would reduce the number of licensing actions required as a result of changes in possession limits of related materials. In order to assure that adequate safeguards be maintained within the framework of this more generalized approach, provisions for more stringent control, accountability, and leakage testing of byproduct, source and special nuclear materials were included.

The proposed format, of this change request, is modeled after the Fort Calhoun Station, Operating License Docket No 50-285. It has minor revisions to the standard format suggested in item 1 of the January 24, 1975 NRC letter. This proposal, like the Fort Calhoun License,

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eliminates the specific quantities of byproduct or source or special nuclear material as described in the standard format (100 millicuries for byproduct and 100 milligrams each for source or special nuclear material). The removal of these specific quantities is consistent with the objective of this license change to simplify the licensing process.

Issuance of Amendment No 98, dated October 15, 1986, to the Palisades Provisional Operating License provided Technical Specifications for leakage testing and surveillance and reporting requirements in conformance with Item 2 of the January 24, 1975, letter.

Finally, for Item 3, we control the byproduct, source or special nuclear material sources exceeding 100 millicuries by approved Radiological Services Department procedures which contain the additional information described in the Regulatory Guide 1.70, revision 3.

Regulatory Guide 1.70, Revision 3, has superseded Regulatory Guide 1.70.3. The list of sources meeting these conditions in use at Palisades is included below.

<u>Isotope</u>	<u>Quantity</u>	<u>Form</u>	<u>Use</u>
PuBe	5 Ci	Sealed Source	Instrument Calibration
PuBe	1 Ci	"	"
Cs-137	10 Ci	"	"
Cs-137 (ordered)	400 Ci	"	"
Cs-137	120 mCi	"	"
CS-137	250 mCi	"	"

In the NRC safety evaluation for Amendment 98, the Staff noted they had reviewed the Palisades' personnel qualifications, facilities, equipment and procedures for handling byproduct, source and special nuclear material and found them consistent with Regulatory Guide 1.70.3 and meeting the requirements of 10 CFR Parts 30, 40 and 70. The Staff further found on the basis of the Palisades' radiation safety program, previous reviews, and information provided by NRC, Region III, that Palisades has an adequate Health Physics organization and radiation protection program, and that personnel are adequately trained to handle the sealed sources licensed for Palisades. The Staff concluded that incorporation of flexible, yet controlled licensed provisions for the receipt possession, and use of byproduct, source and special nuclear material into the Palisades Operating license is acceptable.

We conclude that the Staff Safety Evaluation for Amendment 98 is also applicable to this proposed license change and that control of the byproduct, source and special nuclear material by approved procedures ensures we are in full compliance with Regulatory Guide 1.70.3, and the subsequent Regulatory Guide 1.70, Revision 3, and satisfy the requirements of 10 CFR Parts 30, 40, and 70 concerning the licensing of byproduct, source, and special nuclear material.

The staff in the Amendment 98 Safety Evaluation also noted that the amendment, like this proposal, does not authorize an increase in the amount of special nuclear material used as reactor fuel. The amount of reactor fuel which can be received, used, and possessed is limited by onsite fuel storage capacity, both new and spent, and by amounts required for operation. The amount of nuclear fuel is described in the FSAR, Chapter 9.11.

Analysis of No Significant Hazards Consideration

The control of byproduct, source or special nuclear material sources exceeding 100 millicuries is by approved Radiological Services Department procedures which contain information described in Regulatory Guide 1.70.

The ability to handle sources has been demonstrated at Palisades since the Provisional Operating License was issued. Personnel qualifications, facilities, and equipment and procedures for handling have also been established. Surveillance leak testing to determine source leakage was incorporated into the Technical Specification, Section 6.21, approved in Amendment No 98.

The amount of reactor fuel which can be received, possessed, and used may vary from the present license limit but will be limited by available storage and amounts required for operation.

The changes do not involve a significant hazards consideration at Palisades as this change would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated. This change revises the license conditions for the amount of special nuclear material, source material, and byproduct material in accordance with the NRC's letter of January 24, 1975, with some modification. Provisions to ensure reactor fuel is limited to amounts compatible with the present possession amounts are controlled by the amount of storage space and fuel necessary for reactor operation as described in the FSAR.

The sources will be adequately leak tested, stored and used and records will be maintained as required by the Technical Specification, Section 6.21.

- (2) Create the possibility of a new or different kind of accident from any previously analyzed. Appropriate controls for receipt, handling and storage of the special nuclear material, byproduct material and source material are in place and remain unchanged as a result of this request to ensure no new or different accident will be created.

- (3) Involve a significant reduction in a margin of safety. The controls over the receipt, handling and storage remain unchanged as a result of this request. These controls will ensure no safety margin is 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


F W Buckman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 26th day of May 1987.


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