



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

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Nuclear Regulatory Commission
Document Control Desk
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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATIONS CHANGE REQUEST REVISION -
STEAM GENERATOR AUGMENTED INSERVICE INSPECTION
PROGRAM (TAC NO. 56365)

Consumers Power Company letters of September 28, 1984 and June 5, 1987 submitted proposed Technical Specification changes for the steam generator augmented inservice inspection program. Amendment 106 granted approval of the portion of the proposed changes related to extending the inspection interval to 30 months if certain conditions of the previous inspection are met. This revision to the previous requests addresses several issues raised in a telephone conversation between members of the NRC and CPC staffs on July 14, 1987. We believe those issues have been fully addressed in the revised pages and the discussion of those changes that follows.

The revised attached page changes replace all those previously proposed page changes. Double lines in the right margin indicate revisions to the previous change requests.

In Specification 4.14.2.4, a sentence has been added to clarify actions to reevaluate the sleeve inspection interval in the event steam generator tube sleeve degradation occurs. The basis for decreasing the sleeve inspection requirement from every steam generator inspection to once every third inspection is because there has been no degradation detected in the 33 sleeves since their installation in 1976 and 1978. The sleeve inspection, which requires three days, represents a large expense from both an ALARA standpoint and in outage time.

In Specification 4.14.2.6, the proposed 3% supplementary sample size has been increased to 6%. In Table 4.14.1 this change is repeated and the second supplementary sample size is increased from 6% to 12%. These changes are more consistent with the Standard Technical Specifications.

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Specification 4.14.3, Inspection Techniques, has been deleted and the subsequent sections were renumbered for continuity. A statement concerning inspection techniques was instead added to the Basis. Specification 4.14.3.1, as proposed, was inappropriate as a specification and is, therefore, removed to the basis. Specification 4.14.3.2 was in error as it is not our policy to average the results of three eddy current tests to determine a final results; therefore, the specification was deleted.

In Specification 4.14.4.3 (renumbered), the degradation limits for the regions in the tube/sleeve assemblies are changed in region 1 from 34% to 28% and in region 2 from 25% to 19%. These values were inadvertently listed incorrectly as a result of not subtracting the operating allowance of 6% from the maximum allowable sleeve degradation.

Specification 4.14.4.4 (renumbered) has been revised to clarify the NRCs role in approving new degradation limits.

Specification 4.14.4.5 (renumbered) has been supplemented with a requirement for NRC approval of the sleeving method prior to repair.

The second paragraph in Specification 4.14.2 in the existing Technical Specifications has been omitted from the change request due to its confusing nature and inconclusive content. As standard policy, Consumers Power Company checks all tubes which have dent permeability or copper readings in the last inspection as follows. The historical ECT results for such an area are reviewed in order of the most recent results to the least recent until a valid reading is found. If this reading is greater than or equal to 30%, this tube is added to the inspection list for a full length inspection. Additionally, when the plugging list is developed, areas with invalid readings are subject to further review. The last valid reading recorded for such an area is added to the appropriate operating allowance and then compared against the maximum allowable degradation. If the value exceeds the maximum allowable degradation, then the tube is plugged.

In addition, Specification 4.14.2.5 was included in the Technical Specification Change Request to further address denting. This specification states that in the case where a tube prevents the passage of a 0.540 inch diameter probe (blocked), all unplugged tubes surrounding the blocked tube will be gauged to ensure acceptable denting levels. Consumers Power Company currently practices this policy.

Tables 4.14.1 and 4.14.2, existing Technical Specifications, contain operating allowances and maximum allowable degradation values. For ease of interpretation, these tables have been replaced directly by degradation limits in the Technical Specification Change Request. Specifications 4.14.5.2 and 4.14.5.3, footnotes 1, 2, 3 and 5, have been incorporated into Specification 4.14.5.3; footnote 4 was omitted due to its redundant content.

A discussion of the proposed change to the inspection program, determination of no significant hazards consideration and a check for \$150.00 was provided in the original September 28, 1984 change request.

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An outage is presently planned for April 1988, for the purpose of conducting the steam generator inspection. Issuance of an amendment approving the proposed changes prior to the outage is necessary for our planning purposes and also necessary to comply with the NRC Safety Evaluation of June 11, 1984. We request the Amendment to become effective upon issuance.

James L Kuemin
James L Kuemin
Staff Licensing Engineer

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

Attachment

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