



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

Kenneth W Berry
Director
Nuclear Licensing

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-1636

April 12, 1988

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATIONS CHANGE REQUEST - LOW TEMPERATURE
OVERPRESSURE PROTECTION (LTOP) - REVISION 1

The attached proposed change to the Palisades Technical Specifications is necessary to update the Low Temperature Overpressure Protection (LTOP) requirements.

This is a revision to the December 22, 1987 Technical Specification Change Request. It includes those requirements committed to in our January 20, 1988 and January 22, 1988 submittals and is intended to satisfy the NRC staff as measures to enhance protection against core damage if a loss of coolant event were to occur during heatup and cooldown. Changes from Revision 0 of this proposed Technical Specifications change are marked with a single hash mark in the right-hand margin in the "Request for Change" section, and a double hash mark on the proposed pages. Proposed pages with a single hash mark are the same as Revision 0. Revised Figures 3-1, 3-2, and 3-3 have been added and no hash marks included.

As the reactor vessel is exposed to fast neutrons, the ability of the material at the reactor beltline to resist brittle fracture at low temperatures is decreased. Periodically, the upper pressure limit at given temperatures must be lowered to keep the pressure/temperature relationship within the ductile range of the beltline material. Specifically, this proposed Technical Specifications change ensures LTOP equipment will keep the Primary Coolant System (PCS) temperature and pressure parameters within the limits specified by 10CFR50 Appendix G. Concurrently, safety injection equipment operability is specified to protect against a Loss of Coolant event. The conflicting objectives of limiting system pressure for LTOP consideration and insuring adequate Safety Injection flow are difficult to satisfy under all PCS conditions; however, we believe this proposal presents the optimum combination of presently existing regulation, protection objectives and plant operability.

OC0288-0039-NL02

8804120047 880412
PDR ADOCK 05000255
P DCD

ADOC
1/1

Nuclear Regulatory Commission
Palisades Plant
TSCR - Rev 1 - LTOP
April 12, 1988

2

Consumers Power Company commits to operate the Palisades Plant in accordance with these proposed changes to the Technical Specifications until they are approved as a license amendment. The proposed changes to the Technical Specifications are more restrictive than existing Technical Specifications.

A check for \$150.00, as required by 10CFR170.21, was included with our December 22, 1987 submittal of Revision 0 of this Technical Specification Change Request.

Kenneth W Berry

Kenneth W Berry
Director, Nuclear Licensing

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

Attachment