

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 4.1.3, item 4.c, surveillance method, change to read as follows:

"c. Detector exposed to remote operated radiation check source or integral electronic check source."

II. Discussion

The above proposed Technical Specifications change is requested to allow the monthly surveillance of the Evaporator Control Panel area monitor (see FSAR Table 11-16) which will be replaced during the current refueling outage. The present monitor is being replaced due to reliability problems. The present monitor is equipped with an integral radiation check source while the new monitor will use an electronic check "source" via a change in the detector high voltage. The present analog system is subject to instrument drift while the new digital system greatly reduces this possibility. Replacement of other area monitors with the new digital monitor system is also being planned. Therefore, the proposed change will allow for surveillance by both the old and new methods and applies to both types of monitors. Malfunctions of the new monitor are displayed on a readout. The system performs continuous self diagnostics and displays error codes if problems exist. The new monitor will incorporate the same range from 0.1 mr/hr to 10^7 mr/hr as the present system and have the same sensitivity of $\pm 20\%$ as specified in FSAR Table 11-16.

Analysis of No Significant Hazards Consideration

The proposed Technical Specifications Change of surveillance method does not involve an increase in the probability or consequences of an accident. The new digital monitor is not prone to instrument drift from calibrated values which will improve the reliability over the old monitor. The new monitor has malfunction displays and performs continuous self diagnostics. The Technical Specifications will continue to require daily checks and an 18 month calibration via an external source. These, in combination with the electronic check source, will ensure proper operation of the area monitor. The new monitor range and sensitivity are equivalent to the present monitor.

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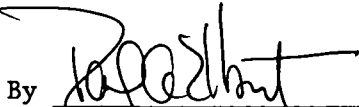
The new monitor system surveillance method will not create the possibility of a new or different kind of accident than previously evaluated as the change in the monthly test method does not affect any accident analysis.

The new monitor provides the same function as the old monitor and the change in the surveillance test method has no effect on the margin of safety defined in the basis for any Technical Specification.

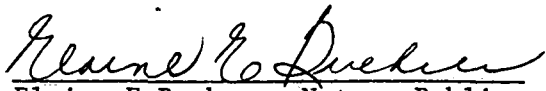
III. Conclusion

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 
Paul A Elbert, Vice President
Fossil and Hydro Operations

Sworn and subscribed to before me this 24th day of August 1988.


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