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November 21, 1988

Nuclear Regulatory Commission
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Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
IMPACT OF REGULATORY GUIDE 1.99 REVISION 2 ON OPERATIONS - RESPONSE TO GENERIC
LETTER 88-11

References: 1. Telephone conference, PNRandall/RWSmedley, 10/19/88
2. Telephone conference, TVWambach/RWSmedley, 10/14/88

NRC letter dated July 12, 1988 (Generic letter 88-11) requested that Licensees submit, within 180 days of the effective date (May 27, 1988) of Revision 2 of Regulatory Guide 1.99, the results of technical analysis using Regulatory Guide 1.99 Revision 2 methodology to determine what modifications of pressure - temperature limits contained in Technical Specifications are necessary in order to continue to satisfy the requirements of 10CFR50 Appendix G and to submit a schedule of actions they propose to take.

Palisades Plant used draft Regulatory Guide 1.99 Revision 2 methodology to determine the pressure-temperature limits contained in existing Technical Specifications. The differences between draft Reg Guide 1.99 Revision 2 and Reg Guide 1.99 Revision 2 are small, and should, according to NRC staff, result in only a one or two degree difference in RT_{NDT} when the tables are used (Reference 1). Palisades Technical Specification pressure-temperature limits were derived using the tables. In view of the conservatism in the pressure-temperature limit determination analysis, a one or two degree effect on RT_{NDT} is not considered significant. Therefore, no additional analysis nor modifications to existing Technical Specifications pressure-temperature limits are necessary for continuation of compliance with 10CFR50 Appendix G. No further actions caused by the required use of Reg Guide 1.99 Revision 2 methodology are planned.

The staff has additionally requested (Reference 2) that we include information regarding the effect on Palisades 10CFR50.61 (PTS) compliance if Reg Guide 1.99 Revision 2 methodology is used to determine compliance with 10CFR50.61

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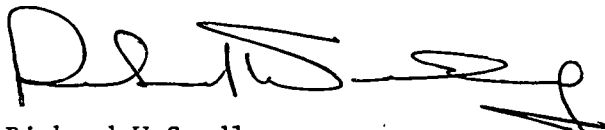
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screening criteria. As previously committed in our March 9, 1988 letter, additional analysis results will be submitted on or before December 1, 1988. At this time, however, in view of Cycle 8 core design changes, we are predicting that use of Reg Guide 1.99 Revision 2 methodology in determining when Palisades would exceed 10CFR50.61 screening criteria would cause Palisades to exceed those criteria in the year 1999.



Richard W Smedley
Staff Licensing Engineer

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