



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
OUTSTANDING TECHNICAL SPECIFICATIONS CHANGE REQUESTS

In Consumers Power Company's, September 23, 1988 response to the NRC SALP 8 report for Palisades, we noted our participation in the industry-NRC effort to develop improved Technical Specifications. Our goal is to submit restructured Palisades Technical Specifications following the lead Combustion Engineering plant's (San Onofre) submittal in early 1990.

Our SALP 8 response also noted we would review and prioritize our list of outstanding Technical Specifications Change Requests (TSCRs) and provide the NRC an opportunity to review the list. We met with the NRC's Palisades Project Manager, TVWambach, on October 20, 1988 to review the list. Following the meeting, we determined that several of the TSCRs pending resubmittal by Consumers Power Company, as well as others pending approval by the NRC, should be reprioritized. We again met with Mr Wambach and the new Palisades Project Manager AWDeAgazio on December 16, 1988 to discuss the prioritization of the TSCRs.

The prioritization discussed with Messrs Wambach and DeAgazio delegates nearly all of the outstanding TSCRs to two groups. The first group are those TSCRs we are requesting to be withdrawn and which will be factored into the Palisades' restructured Technical Specifications effort. The second group are those TSCRs for which NRC approval is being requested. The remaining two TSCRs will be addressed in the short-term, during 1989. This prioritization would relieve Consumers Power Company resources to concentrate on the restructured Technical Specifications effort and also relieve the NRC, in the short term, of their review and approval tasks associated with the backlogged TSCRs that are being withdrawn. The two exceptions are discussed in the attached table. For those TSCRs that are being withdrawn, we commit to maintaining the technical requirements active through administrative controls until approval is obtained for the restructured Technical Specifications. This commitment applies to only those TSCRs which are more restrictive or which add requirements to the present Technical Specifications.

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Nuclear Regulatory Commission
Palisades Plant
Outstanding TSCRs
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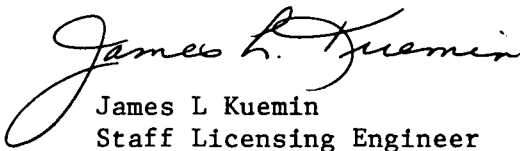
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The TSCRs we intend to pursue with the NRC in the short-term will be those which pose a unique concern, are of immediate need or benefit to Palisades, or are consistent with the NRC's short-term Technical Specifications improvements. We request NRC's support by completing the required TSCRs reviews, that remain on the Docket, within the next 4 to 6 months.

With respect to short-term improvements, we intend to submit changes consistent with Generic Letters 87-09 (Sections 3.0 and 4.0 of the Standard Technical Specifications) and 86-10 and 88-12 (Removal of Fire Protection Requirements) over the next several months.

Attached is a listing of the outstanding Technical Specifications Change Requests which includes a summary of proposed action.

Two change requests (dated May 14, 1980 and November 12, 1981) previously withdrawn via letter dated March 5, 1986, and concurred with by NRC letter dated May 28, 1986 are subject to resubmittal, as stated in the NRC letter. Instead of a resubmittal, will factor any necessary changes from these two withdrawn requests into the restructured Technical Specifications.


James L. Kuemin
Staff Licensing Engineer

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

Attachment

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OUTSTANDING TECHNICAL SPECIFICATIONS CHANGE REQUESTS

<u>Submittal/ Rev Date</u>	<u>Subject</u>	<u>Comments</u>
1. 8/21/80	Definition of Operability (TAC No M43052)	CPC requests withdrawal. Portions of this TSCR have been superseded by Amendment 85. The definition of operability in Standard Technical Specifications (STS) is used when interpretation of operability is required. The STS definition will be factored into the restructured Technical Specifications (RTS).
2. 11/24/80	Containment Spray	CPC requests withdrawal. Palisades Plant will continue to maintain the LCOs for this proposed change with appropriate administrative controls. The change will be factored into the RTS.
3. 12/3/80	Undervoltage Protection SEP Topic VIII-1.A	CPC requests withdrawal. The LCOs proposed in this change have been determined to be inappropriate and require revision. Resubmittal with appropriate changes will be factored into the RTS. (Reference NRC SER of 12/22/81)
4. 7/6/81	Heat Balance Surveillance	CPC requests withdrawal. Admendment 118 included a requirement to conduct the surveillance when above 15% power and supersedes the need for this change request.
5. 3/3/82 Rev 3/21/88	Airlock Leak Test (TAC No M64339)	NRC approval requested. We believe our March 21, 1988 letter corrected the TSCR and it is now acceptable to the NRC reviewer.
6. 6/25/82	I&C RPS & ESFAS	CPC requests withdrawal. Appropriate changes to requirements for the present Technical Specifications (TS) for RPS and ESFAS will be incorporated into the RTS.
7. 8/30/82 4/21/88	PCS Gas Vent NUREG-0737 Item II.B.1 (TAC No M54405)	CPC requests withdrawal. The PCS gas vent requirements proposed in the TSCR will be maintained under appropriate administrative controls and will be established so that changes are reviewed in accordance with 10CFR50.59. Removal from the TS is consistent with the NRC's conclusions as to which STS requirements are to be retained in the restructured STS (TEMurley, NRC, to JKGasper, CEOG, May 9, 1988.).

OUTSTANDING TECHNICAL SPECIFICATIONS CHANGE REQUESTS

Submittal/ Rev Date	Subject	Comments
8. 11/5/82	NUREG-0737 Items II.F.1.1, .2, .3 & .6 Noble Gas Effluent Sampling of Plant Effluent Containment Hi-Range Radiation and Containment Hydrogen Monitors (TAC No. M54555)	CPC requests withdrawal. The Stack Effluent Noble Gas and Particulate Monitors and the Main Steam Safety and Dump Valve Discharge Monitor are currently in the RETS section of the TS. The containment hi-range radiation monitor and containment hydrogen monitor requirements will be maintained under administrative controls for the interim. However, due to excessive required maintenance on the hydrogen monitoring system containment isolation valve position indicators, the daily check, which was accomplished by opening the isolation valves and comparing the readings of both the hydrogen monitors, will be eliminated. This supersedes our Material Condition Task Force item CIS-04 in CPC letter of December 1, 1986. All required changes will be factored into RTS.
9. 4/10/84 rev 3/25/86	Addition of 480V distribution Buses & redistribution of MCC (TAC No. M54795)	CPC requests withdrawal. Pending approval of the Palisades RTS, the portions of this TSCR that supplement the present TS will remain under administrative controls.
10. 11/19/84 rev 11/21- 22/85, rev 2/28/86	Control Room Habitability 0737 Item III.D.3.4 (TAC No M 56867)	CPC requests withdrawal. Changes may be necessary following current analysis for control room habitability. The changes will be incorporated into administrative controls and factored into the RTS submittal.
11. 2/5/85 11/21/85 Rev 11/22/85 Rev 3/9/87	Inspection & Testing of Fire Protection Devices (TAC No. M57255)	CPC requests this TSCR remain on hold, pending our request to remove and relocate the present Fire Protection TS requirements to alternate procedures.

OUTSTANDING TECHNICAL SPECIFICATIONS CHANGE REQUESTS

Submittal/ Rev Date	Subject	Comments
12. 4/30/85	Shutdown Cooling System (TAC No M42130)	CPC intends to submit a revision in the near future.
13. 5/13/85 Rev 2/2/88	Station Battery Service & Discharge (TAC No. M67411)	NRC approval requested. Questions have been resolved with NRC and we believe the proposal requires only minor NRC review.
14. 5/23/85	Leakage Detection System (TAC NO. M53545)	CPC requests withdrawal and commits to reevaluate SEP Topic III-5.A with respect to the Containment Atmospheric Gaseous Radiation Monitor then submit an appropriate revision during the RTS. In the interim, the remaining leakage detectors described in the TSCR will be incorporated in appropriate administrative controls.
15. 07/30/85	HPSI Flow Instruments (TAC No M59310)	NRC approval requested. HPSI flow instruments are not in present STS. The HPSI flow instruments per RG 1.97 are Category 2, Type D instruments used to monitor flow. Category 2, Type D instruments are not required TS equipment per NRC letter, TEMurley, to J K Gasper, CEOG, May 9, 1988. Murley's letter incorporates only Category 1 Type A variables, which meet criterion 3 of the NRC's interim policy statement on TS improvements, into the restructured STS. Therefore, the HPSI instruments may be removed from the TS.
16. 11/21/85 Rev 10/25/87 Rev 9/2/88	Core Exit Thermocouples	NRC approval requested. The September 1988 resubmittal should resolve NRC comments.
17. 11/21/85	Alternate Shutdown & Emergency Lighting Systems	NRC approval requested of the Alternate Shutdown portion of this TSCR. The Emergency Lighting Systems portion of this TSCR is to remain on hold pending our submittal on Fire Protection TS discussed above (No 11).

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18. 10/20/86, Rev 4/30/87	Containment Air Cooler Design Feature	NRC approval requested. This represents only a minor TS revision to Section 5.2.3.
19. 2/25/87	RAS Actuation Logic (TAC No M64784)	NRC approval requested. This change corrects the actuation system logic requirements.
20. 3/10/87	RETS Corrections (TAC No M64992)	NRC approval requested. It appears that consideration for a RETS rule change will not be forthcoming in the near future.
21. 5/3/88	Refueling Boron Concentration (TAC No 69583)	CPC requests withdrawal. The proposed requirements will be used for interpretation and subsequently factored into the RTS.
22. 8/4/88	Core Cooling Instrumentation (TAC No M69224)	NRC approval requested. The TSCR incorporates changes consistent with Generic Letter 83-37. Our implementation letter of January 9, 1988 documented completion of CPC's required actions.
23. 9/15/88	Containment Isolation System	NRC approval requested. This change will implement requirements like the present STS and is of mutual interest to CPC and NRC.
24. 9/21/88	Remove Organization Charts (TAC No 69559)	NRC approval requested. This change is in accordance with Generic Letter 88-06 and a short-term TS improvement.
25. 9/23/88 Rev 1/16/89	PRC, NSSD, & PSL (TAC No 69584)	NRC approval requested. These changes are beneficial to CPC as they will strengthen both onsite and offsite review efforts.

OUTSTANDING TECHNICAL SPECIFICATIONS CHANGE REQUESTS

<u>Submittal/ Rev Date</u>	<u>Subject</u>	<u>Comments</u>
26. 10/6/88	Linear Heat Rate (TAC No 69587)	CPC requests withdrawal. This recent change rearranges the Specifications to provide clarification. In the interim, it will be used for interpretation purposes and factored into the RTS.