

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. Change Specification 3.0.4 to read as follows:

"Entry into a reactor operating condition or other specified condition shall not be made when the conditions for the Limiting Conditions for Operation are not met and the associated action requires a shutdown if they are not met within a specified time interval. Entry into a reactor operating condition or other specified condition may be made in accordance with action requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to reactor operating conditions as required to comply with action requirements. Exceptions to these requirements are stated in the individual specifications."

B. Add Note (g) to items 1 to 6 and 8 to 10 of Table 3.17.1.

"(g) Required operable if any clutch power supply is energized."

C. Add Note (h) to item 7 of Table 3.17.1.

"(h) Automatically bypassed below 15% power."

D. Add new Specification 4.0.3 to read as follows:

"Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The action requirements may be delayed up to 24 hours to permit the completion of the surveillance, when the allowable outage time limits of the action requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment."

E. Add new Specification 4.0.4 to read as follows:

"Entry into a plant condition or other specified condition shall not

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be made unless the Surveillance Requirement(s) associated with a Limiting Condition of Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to plant conditions as required to comply with action requirements."

F. Add new Specification 4.0.5 to read as follows:

"Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda, as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

| <u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u> | <u>Required frequencies for performing inservice inspection and testing activities</u> |
|--|--|
| Weekly | At least once per 7 days |
| Monthly | At least once per 31 days |
| Quarterly or every 3 months | At least once per 92 days |
| Semiannually or every 6 months | At least once per 184 days |
| Every 9 months | At least once per 276 days |
| Yearly or annually | At least once per 366 days |

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification."

- G. Add NOTE (7) to items 1.a. and 13.a. of Table 4.1.1. and add note at end of table.

"(7) Required if the reactor is critical."

- H. Add NOTE (8) to items 4.a. and 5.a. of Table 4.1.1. and add note at end of table.

"(8) Required when PCS is > 1500 psia."

- I. Delete NOTE (4) for items 1b and 2a of Table 4.1.2, and add new NOTE (4) for item 1a (channel check, shift surveillance). Add Note at end of table.

"(4) Required when PCS is > 1500 psia."

- J. Revise Specification 4.3 as follows:

Delete items a, b, c, and d. Remove asterisk from items h and i and remove asterisk footnote.

- K. Add new Basis statement for Specification 3.0 and 4.0 as shown on attached page changes.

II. Discussion

The above proposed Technical Specifications changes are requested in order to conform the Palisades Technical Specifications to Sections 3.0 and 4.0 of the Standard Technical Specifications, as revised by Generic Letter 87-09 dated June 4, 1987. The proposed changes follow the wording changes provided in Generic Letter 87-09 with the exception that the words "MODE" or "OPERATIONAL MODE" are replaced with the words "reactor operating condition". The present Palisades Plant Technical Specifications do not use the word MODE (as defined in the Standard Technical Specifications) to describe plant operating status; therefore, this word modification is necessary to conform to the current description of reactor operational status provided in the Palisades Plant Technical Specifications. Incorporation of "MODE" into the Palisades Technical Specifications will be accomplished in our submittal of the restructured Technical Specifications in early 1990. A further discussion of the individual proposed changes is provided below.

- A. The current provisions of Palisades Plant Technical Specification 3.0.4 require that the plant shall not enter into an operational condition or other specified condition unless the requirements of the applicable Limiting Conditions for Operation (LCO) are met, regardless of the provisions of the Action Requirements of the LCO, even when conformance to the Action Requirements would permit continued operation of the plant. The proposed change to Specification 3.0.4 would modify this unduly restrictive statement to allow the continued operation of the plant when conformance to the LCO Action Requirements provides an acceptable level of safety for continued operation.

- B. The instrument operating requirements for the Reactor Protection System do not contain Applicability requirements as in Standard Technical Specifications. This addition is beneficial for defining when equipment is required to be operable and conversely when it is allowed to be out of service.
- C. An automatic bypass of the loss of load trip has always existed at less than 15% power but not identified in the Technical Specification.
- D. The current Palisades Plant Technical Specifications do not contain Specification 4.0.3 or an equivalent statement. The addition of Specification 4.0.3 provides conformance to the Generic Letter 87-09 Standard Technical Specifications. In addition, this specification establishes a clear relationship between the Surveillance Requirements for a system and the operability requirements of the Limiting Conditions of Operation for that system.
- E. The current Palisades Plant Technical Specifications do not contain Specification 4.0.4 or an equivalent statement. The addition of Specification 4.0.4 provides conformance to the Standard Technical Specifications.
- F. The current Palisades Plant Technical Specifications do not contain Specification 4.0.5, however, portions of Palisades Plant Technical Specifications Section 4.3 contain wording that is equivalent to the wording of Section 4.0.5 of the Standard Technical Specifications. The addition of Specification 4.0.5 would provide conformance of the Palisades Plant Technical Specifications to the Standard Technical Specifications and would clarify the definition of the frequencies of required surveillance tests.

The present Section 4.3c pertains only to inservice testing of Class 1, 2, and 3 pumps as approved in Amendment 53 (October 15, 1979). Consumers Power Company's application, at that time, included requirements for inservice testing of valves, but the NRC had not completed review of applicable valve testing relief request. The pump testing relief requests were approved. Both the pump and valve testing relief requests have since been resubmitted. (Letters of January 18, 1989 and May 17, 1988.) The proposed change in this Technical Specification Change Request includes both pumps and valves. Consumers Power Company's expectation is that the pump and valve testing relief requests will be acted upon concurrent with the review of this proposed Technical Specifications Change Request. If NRC staff approval of the relief request will not be forthcoming, we request deletion of the last sentence in 4.0.5a and the last sentence in the Basis pertaining to 4.0.5.

- G. The addition of NOTE (7) to items 1.a. and 13.a. of Table 4.1.1. "Required if the reactor is critical," is made to identify when the surveillances are required.
- H. The addition of NOTE (8) to items 4.a and 5.a of Table 4.1.1., "Required when PCS is > 1500 psia," is due to the pressurizer pressure instrument range being 1500 to 2500 psia.

- I. Existing Note 4 to Table 4.1.2 is obsolete as it pertains to a 1981 refueling outage deferral and, therefore, can be removed.

As noted in H above, the pressurizer pressure instrument ranges are from 1500 psia to 2500 psia. A channel check is, therefore, not required below 1500 psia.

- J. Proposed change E. would delete those items in the current Technical Specifications which are covered in proposed Specification 4.0.5, or are outdated. The items that are unique to the Palisades Plant surveillance program would be retained in Section 4.3.
- K. Proposed change F. would add a Basis Statement for Sections 3.0 and 4.0 of the Palisades Technical Specifications. The current Sections 3.0.1 through 3.0.4 do not contain a Basis Statement. The addition of a Basis Statement would ensure that interpretation of Section 3.0 is in conformance with the intent of Specifications 3.0.1 through 3.0.4. The current Palisades Plant Technical Specifications also do not contain a Basis Statement for Sections 4.0.1 and 4.0.2. The addition of a Basis Statement would ensure that the interpretation of Specifications 4.0.1 through 4.0.5 is in conformance with the intent of these specifications. The Basis for 4.0.3 (last sentence) was modified to indicate that a surveillance is not necessary to declare equipment operable unless the surveillance interval has expired.

Analysis of No Significant Hazards Consideration

The changes proposed in this request follow recommendations from Generic Letter 87-09 which were developed to resolve specific problems identified with the general requirements on the applicability of Limiting Conditions for Operation and Surveillance Requirements in Sections 3.0 and 4.0 of the Standard Technical Specifications. The proposed changes to 3.0 and 4.0 also include improved bases statements. Reactor Protection System (RPS) instrumentation operability requirements have been proposed that are consistent with the Standard Technical Specifications and applicable safety analysis. Exceptions to conditions when certain instrument surveillances are required to be performed have also been added. These latter two changes have been proposed due to 4.0.4 requiring that all applicable surveillances be met before entry into an operational condition specified in the Applicability statement unless as otherwise stated. Since the present Technical Specifications do not address RPS applicability or identify when certain surveillances (channel checks) need not be performed, provisions were added to account for these conditions.

The proposed changes to the Technical Specifications do not involve physical changes to the plant. The changes do add requirements for Class 1, 2 and 3 valves which is presently an administratively controlled program at Palisades. Therefore, no additional surveillances are required. The addition of RPS instrumentation operability

requirements and exceptions to when certain surveillance are required are consistent with the plant safety analysis and Standard Technical Specifications. Therefore, there is no increase in the probability or consequences of a previously evaluated accident.

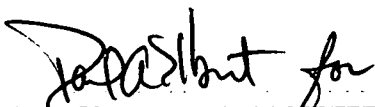
Because these proposed changes do not involve modification to the physical condition of the plant, or reduce the operability or applicability of the RPS instrumentation or the surveillance of certain instrumentation with respect to the safety analysis, they do not result in the creation of a new or different kind of accident from any previously evaluated.

The changes to Section 3.0 proposed by this request will permit continued operation of the Plant when conformance to the action requirements of a Specification provides an acceptable level of safety for continued operation. The addition of a Basis statement for Section 3.0 will ensure that interpretation of the Specifications of Section 3.0 is consistent with the intent of those Specifications. The addition of operability/applicability requirements for RPS instrumentation are consistent with safety analysis requirements. The changes to Section 4.0 will place the general requirements of the Surveillance Program as described by 10 CFR 50 together within Section 4.0, rather than in two sections (4.0 and 4.3) as in the current Palisades Technical Specifications. The addition of Specifications 4.0.3, 4.0.4, 4.0.5, and a Basis statement for Section 4.0 serves to increase the definition of the Palisades Plant Surveillance Program and will ensure that interpretation of the Specifications of Section 4.0 meets the intent of those Specifications. The proposed Section 4.0.5 includes inservice testing requirements for both pumps and valves versus the present 4.3 requirements which are for pumps only. The revisions to Tables 4.1.1 and 4.1.2 allow surveillances to be omitted when the equipment is not required to be operable. The additions to Sections 3.0 and 4.0 and changes to the instrument operability/applicability requirements, therefore, do not reduce the margin of safety as defined in the basis of the Technical Specifications.

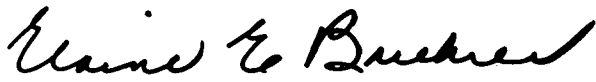
III. Conclusion

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 been reviewed by 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 
David P Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 3rd day of April, 1989.


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