

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 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. Add new Section 3.1.9 on shutdown cooling to the Primary Coolant System (PCS) section and to the Table of Contents. This section lists operability requirements for systems and equipment which perform the shutdown cooling functions whenever PCS temperature is <325°F and fuel is in the reactor.
- B. Add new Section 3.7.3 to the Electrical Systems Section that lists the electrical system requirements to permit shutdown cooling systems and equipment to be operable.
- C. Add new surveillance item 14 to Table 4.2.2 to monitor steam generator secondary water level when the PCS temperature is <325°F and the steam generators are needed to meet shutdown cooling requirements of new Technical Specification Section 3.1.9.

II. Discussion

The above proposed Technical Specification changes provide operational requirements and action statements for the Primary Coolant System (PCS) and the Shutdown Cooling System (SDC) when the PCS temperature is <325°F.

- A. Change A (shutdown cooling equipment operability) provides requirements for the PCS and the SDC system when the PCS temperature is <325°F. The current Technical Specifications do not contain provisions for PCS or SDC operation when PCS temperature is <325°F.

The proposed changes integrate various requirements from:
a) Combustion Engineering Standard Technical Specifications (NUREG 0212 Revision 3 draft), b) Combustion Engineering Restructured Standard Technical Specifications (May 1989), c) Generic Letter 88-17 (Loss of Decay Heat Removal) and d) specifics of the Palisades Shutdown Cooling system design configuration.

3

A notable difference between the Standard Technical Specifications and the proposed Specification is that Palisades does not have two independent shutdown cooling trains. The SDC system has a common suction line from the PCS to two shutdown cooling pumps, which also function as the Low Pressure Safety Injection (LPSI) pumps. The discharge of the pumps enters a common header which in turn splits to each of two heat exchangers and then again into a common header before again dividing into the four LPSI piping headers to the PCS cold legs. (Reference Palisades FSAR Section 6.1 for further information.)

- B. Change B (electrical requirements) adds electrical power requirements to supply the required shutdown cooling system whenever the PCS temperature is $<325^{\circ}\text{F}$. Specific action statements are included as appropriate.
- C. A new surveillance is added to verify the secondary water level in each steam generator when they are needed to meet shutdown cooling requirements.

III. Analysis of No Significant Hazards Consideration

The current Technical Specifications do not contain sufficient provisions for the Primary Coolant System (PCS) or the Shutdown Cooling System (SDC) when the PCS temperature is $<325^{\circ}\text{F}$. This is not consistent with the Combustion Engineering Standard Technical Specifications (NUREG 0212 Revision 3 draft).

These proposed Technical Specifications provide clarification and new requirements for the operation of the PCS and the SDC systems: 1) when PCS temperature is $<325^{\circ}\text{F}$ and 2) when removing the SDC system from service. The implementation of these proposed Technical Specifications will require specific equipment to be maintained operable when PCS temperature is $<325^{\circ}\text{F}$. These proposed requirements are in conformance with those specified in the Palisades FSAR and thus will not increase the probability or consequences of malfunction of equipment as previously evaluated.

The proposed equipment operability and surveillance requirements are added to the Technical Specifications in a manner to be consistent with the Standard Technical Specifications, in compliance with the Palisades FSAR; and take into consideration the specifics of the Palisades Shutdown Cooling system design configuration. Therefore, the possibility of an accident or malfunction of a different type than any previously evaluated in the Palisades FSAR has not been created.

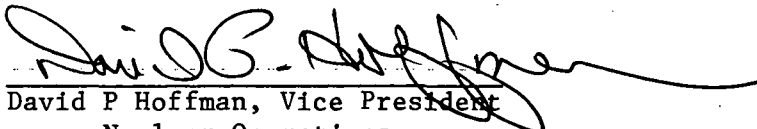
These proposed Technical Specifications clearly identify the operating requirements of the shutdown cooling system to maintain core cooling when the PCS temperature is $<325^{\circ}\text{F}$. Therefore, the margin of safety has not been reduced with these proposed additions to the Technical Specifications.


IV. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined 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


Beverly Ann Avery, Notary Public
Jackson County, Michigan

My commission expires December 7, 1992