



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATION 3.1.8 - LETTER OF INTERPRETATION

Technical Specification 3.1.8 specifies that when the PCS temperature is less than or equal to 300°F, two PORVs with a lift setting of less than or equal to 310 psia shall be operable; and, when the PCS temperature is greater than 300°F but less than 430°F, two PORVs with a lift setting of less than or equal to 575 psia will be operable.

Palisades procedures allow the PORV setpoint to be checked and found acceptable within a ± 22 psi range of the lift setting. Plus or minus 22 psi represents the instrument loop accuracy. This is acceptable because the maximum allowable setpoints specified in the Technical Specifications are at least 32 psi lower than the 10 CFR 50 Appendix G curve, providing ample margin for instrument inaccuracies plus pressure overshoot (Ref. 1). In addition, the required 10 CFR 50 Appendix G pressure/temperature limits as displayed on Figures 3-1 and 3-2 of the Technical Specifications include an additional allowance of 30 psi for pressure measurement errors. Therefore, Consumers Power Company interprets the 310 psia and 575 psia PORV maximum setpoints specified in Technical Specification 3.1.8 to require that the PORV setpoints be less than or equal to 310 psia plus allowable instrument inaccuracy of 22 psi and less than or equal to 575 psia plus allowable instrument inaccuracy of 22 psi.

A proposed change to Technical Specification 3.1.8 that will change the maximum allowable PORV setpoints and address the consideration of allowable setpoint tolerances will be submitted prior to installing the variable (VLTOP) PORV setpoint control. This submittal will occur within the next two months. NRC approval of that proposed change will obviate this Letter of Interpretation and it shall be terminated at that time. Meanwhile, Consumers

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Power Company does not consider it a reportable event if the PORV setpoint is found to be lower than the specified setpoint (310 psia or 575 psia) plus the allowable instrument inaccuracy of 22 psia i.e., 332 psia or 597 psia.

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

Reference

1. Engineering Analysis E-PAL-89-015-01, LTOP-Setpoint-Margins.