Consumers Power
POWERING MICHIGAN'S PROGRESS

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Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATION CHANGE REQUEST - ISI TESTING (TAC NO. 73598)

Enclosed is a request for change to the Palisades Technical Specifications. This change request revises the Technical Specifications to delete critical service water header hydrostatic test requirements. In place of the existing Technical Specifications requirement, the service water system would be tested in accordance with the ASME Code requirements for Class 3 systems, which are less restrictive. Consumers Power Company requests this change be approved prior to the next Palisades refueling outage so the higher pressure hydrostatic test will not have to be conducted. The next refueling outage is currently planned for the fall of 1990.

Kenneth W Berry
Director, Nuclear Licensing

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

Attachments

A047
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OC0789-0150-NL04

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

Change Technical Specification Table 4.2.2, Item 10 to read:

"10. Deleted"

II. Discussion

This proposed Technical Specification change is requested to provide consistency with the ASME Boiler and Pressure Vessel Code, Section XI testing requirements. The Palisades service water system piping design pressure is 100 psig with a normal operating pressure of 65 psig. It is an ASME Code Class 3 system. The current Technical Specification Table 4.2.2, Item 10, requires the service water system to be hydrostatic tested to 150 psig (1.5 times system design pressure) every 5 years, in addition to the ASME Code inservice testing requirements. Under the ASME Code, Section XI, an inservice test consisting of a VT-2 walkdown inspection at normal operating pressure is required once each inspection period of 3-1/3 years with one of the tests conducted at 125 psig (1.25 times system design pressure) each inservice inspection interval of 10 years. To comply with the additional Technical Specification requirement, two of the 3-1/3 year inspection period tests have been conducted at 150 psig.

Through design document reviews and correspondence searches, a basis for selection of the 150 psig test pressure every 5 years is not able to be determined. The existing Technical Specification was implemented prior to the evolution of the current ASME Code, Section XI inservice testing requirements for Class 3 systems and appear to have been chosen on the basis of engineering judgement. The critical headers of the service water system are part of a Class 3 system and should be tested in accordance with the ASME Code.

Testing the critical headers of the service water system to 150 psig is not necessary to determine system operability. Since initial plant operation no system piping deficiencies have been detected during the 150 psig testing. Hydrostatic testing in accordance with the ASME Code would be consistent with industry practice for Class 3 systems and Standard Technical Specifications. Therefore, it is proposed the requirements of Technical Specification Table 4.2.2, Item 10 be deleted. Hydrostatic testing for the critical headers of the service water system would be conducted in accordance with the ASME Code, Section XI.

III. Analysis of No Significant Hazards Consideration

This proposed change to the Technical Specifications does not involve any physical changes to the plant nor does it eliminate any testing requirements. This change reduces the hydrostatic test pressure requirement for the critical service water headers from 150 psig (1.5 times system design pressure) to 125 psig (1.25 times system design pressure) and changes the frequency from once every 5 years to once every inservice inspection interval of 10 years. The normal operating pressure of the service water system is 65 psig with a maximum pump shut off pressure of 104 psi and there are no operating or design considerations which would require a higher test pressure with a greater testing frequency.

This proposed change will lengthen the time between tests and reduce the hydrostatic test pressure, therefore, there is no change to the consequences of an accident previously evaluated and the possibility of a new or different kind of accident is not created. The probability of an accident or malfunction is not increased since there is no physical change to the service water system piping, the duty cycle on the piping is not changed, and the proposed testing requirements are in accordance with the governing ASME Code. The margin of safety is not reduced because testing at 150 psig once every 5 years is in accordance with the ASME Code, Section XI.

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 Services 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

To the best of my knowledge, information and belief, the contents of this Technical Specification Change Request are truthful and complete.

By _____
David P Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 2nd day of August 1989.

_____
Beverly Ann Avery, Notary Public
Jackson County, Michigan
My commission expires December 7, 1992