



**Consumers  
Power**

**POWERING  
MICHIGAN'S PROGRESS**

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April 30, 1990

Nuclear Regulatory Commission  
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Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION ON  
PROPOSED ADMINISTRATIVE CHANGES (TAC NO 75882)

In response to discussion with the NRC staff, Consumers Power Company commits to implement an administrative program to assure an appropriate level of management approval is required when operating conditions are changed from cold shutdown to hot shutdown and from hot shutdown to critical in hot standby with inoperable equipment. This program will be in place by June 1, 1990. The program will consist of requiring a Plant Review Committee (PRC) review and approval of all upward operational condition changes made under Technical Specification 3.0.4.

Consumers Power Company submitted a Technical Specification Change Request by letter dated April 3, 1989 which proposed to revise Technical Specification, Section 3.0.4, to allow plant operating condition changes while in a Limiting Condition for Operation. These proposed changes were formulated to incorporate NRC guidance provided in Generic Letter 87-09. By letter dated July 31, 1989, the NRC requested Additional Information on the proposed changes. That letter requested Consumers Power Company to review all Technical Specification Action Statements for which upward operational condition changes allowed by the proposed Section 3.0.4 could be taken to assure safe long-term operation of the plant consistent with the licensing basis of the plant. Also, it requested implementation of administrative controls to assure use of the proposed Section 3.0.4 would be an exception, with an appropriate level of management approval, rather than common practice.

By letter dated December 18, 1989, Consumers Power Company responded to the Request for Additional Information. In that response, we agreed with the NRC's basis for the request and proposed to revise the administrative section of the Technical Specifications to require a case-by-case review by the PRC of upward operational condition changes made under proposed Section 3.0.4 by the Plant Review Committee (PRC) instead of conducting an up-front, formalized detailed review as requested by the NRC. By letter dated February 14, 1990, the NRC requested we submit the proposed administrative change as a formal

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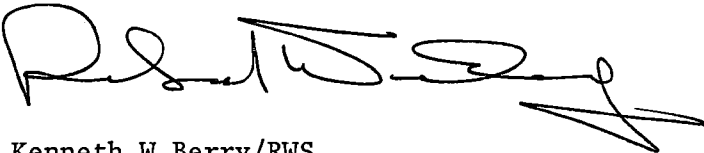
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Palisades Plant  
Additional Info on Prop Admin Changes  
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Technical Specification Change Request. This letter requested Consumer's response by March 20, 1990. Verbal discussion with the Palisades NRC Project Manager extended this date to May 1, 1990.

Subsequent discussions with the NRC Project Manager on March 21, 1990, concluded the NRC's original concern review of Action Statements concern was acceptably resolved by our December 18, 1989 letter. During these discussions, it was also agreed that additional administrative requirements did not have to be added to the Palisades Technical Specifications if we would commit to implementing an administrative program to assure management awareness that operational condition changes are not made with important safety features inoperable. The commitment made in the first paragraph of this letter, therefore, obviates the need to submit a license amendment as suggested by the NRC letter of February 14, 1990.



for Kenneth W Berry/RWS  
Director, Nuclear Licensing

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