

G B Slade General Manager

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Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

October 4, 1990

Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -TECHNICAL SPECIFICATION CHANGE REQUEST -DESIGN FEATURES DESCRIPTION FOR THE PRIMARY COOLANT SYSTEM (PCS)

Enclosed is a request for change to Palisades Technical Specification 5.3.1a, Design Features Primary Coolant System. Under the proposed change, this Technical Specification will be revised to reference the Primary Coolant System (PCS) description contained in Final Safety Analysis Report (FSAR) Section 4.2, "Design Basis", and the references to specific Codes and addenda that currently exist will be removed.

Technical Specification 5.3.1a currently states that the primary coolant system shall be designed and constructed in accordance with the ASME Boiler and Pressure Vessel Code, Section III, including all addenda through the winter of 1965, and the ASA Code for Pressure Piping, B31.1. Under the proposed change, Technical Specification 5.3.1a will stipulate that the primary coolant system is designed and maintained in accordance with the Code requirements specified in Section 4.2 of the FSAR. This change is consistent in content and format with the Standard Technical Specifications.

Upon approval of the proposed change, the FSAR will be amended on a schedule commensurate with that specified in 10 CFR 50.71(e) to provide an up to date reflection of the Code editions and addenda employed during the design and fabrication of original and replacement PCS components. We request that this change be approved prior to startup from the end of the current outage, which is scheduled for January 1991. The effective date of the change should be upon issuance of the Amendment.

A CMS ENERGY COMPANY

Gerald B Slade

Plant General Manager

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

Attachment

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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, which were issued to Consumers Power Company for the Palisades Plant on October 16, 1972, be changed as described in section I below:

I <u>Change</u>

Revise Technical Specification section 5.3.1a as indicated on the attached page change sheets.

II <u>Discussion</u>

The above proposed Technical Specification change is requested to revise the description of Primary Coolant System (PCS) Design Features contained in Technical Specification 5.3.1a. Under the proposed change, this Technical Specification will be revised to replace the description of design Codes used for the Primary Coolant System (PCS) with a reference to FSAR Section 4.2, "Design Basis". The Technical Specification schedule of specific Codes and addenda that currently exists will be removed. A draft revision to FSAR Section 4.2 is attached.

Technical Specification 5.3.1a currently states that the primary coolant system shall be designed and constructed in accordance with the ASME Boiler and Pressure Vessel Code [B&PV], Section III, including all addenda through the winter of 1965; and the ASA Code for Pressure Piping, B31.1. Under the proposed change, Technical Specification 5.3.1a will stipulate that the primary coolant system is designed and maintained in accordance with the Code requirements specified in Section 4.2 of the Final Safety Analysis Report (FSAR). This change is consistent in content and format with the Standard Technical Specifications.

ASME B&PV Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components" governs the construction of replacement components that are installed in nuclear pressure vessels and provides acceptance criteria for replacement components, including those that are constructed to a Code edition or addenda other than the original construction code. As Technical Specification 5.3.1a is currently written, replacement PCS components that satisfy ASME Section XI criteria for acceptability, but that are constructed to a Code edition or addenda other than the original construction code, may require an amendment to the Technical Specifications. Under the proposed change, facility changes of this type will be reflected in the FSAR and a Technical Specification amendment will not be required to reflect Code edition or addenda.

<u>Analysis of No Significant Hazards Consideration</u>

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. Assurance of PCS integrity has been provided in the Palisades design through the use of Codes during design, fabrication, construction, inspection, testing, and classification. The proposed change does not diverge from existing Code requirements. The change merely replaces the reference to specific Codes and addenda that is currently contained in Technical Specification 5.3.1a with a reference to the Codes and addenda listed in FSAR Section 4.2. Therefore, the probability or consequences of an accident have not been adversely affected.

The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated. There is no change to the accident analysis assumptions as a result of the requested change. The change merely replaces the reference to specific Codes and addenda that is currently contained in Technical Specification 5.3.1a with a reference to the Codes and addenda listed in FSAR Section 4.2. The change does not modify or alter existing Code requirements. Applicable Code requirements and design criteria will continue to be maintained in the FSAR following implementation of the proposed change. As a result, a new or different kind of accident is not created by the proposed change.

The proposed change does not involve a significant reduction in the margin of safety. The PCS safety margin is provided through adherence to design criteria (i.e. temperature, pressure, service life, cyclic loads, material properties, etc.), and is assured through the use of design specifications and Codes. The proposed change does not diverge from our existing Code requirements, it merely relocates the reference to specific Codes and addenda to the FSAR. The PCS margin of safety will be maintained following implementation of the proposed change through our continued use of design specifications and applicable design Codes. Consequently, adequate operating margins have been assured and there is no significant decrease in the margin of safety.

III <u>Conclusion</u>

The Palisades Plant Review Committee and the Nuclear Safety Services Department have reviewed this Technical Specification Change Request and have determined that the change does not involve an unreviewed safety question, and, therefore, no significant hazards consideration. A copy of this Technical Specification change request has been sent to the State of Michigan official who is designated to receive such amendments to the Operating License.

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CONSUMERS POWER COMPANY

To the best of my knowledge, information and belief, the contents of this submittal are truthful and complete.

By David W Joos. President Vice Energy Supply Services

Sworn and subscribed to before me this 4/4 th day of October 1990.

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LeAnn Morse, Notary Public Van Buren County, Michigan My commission expires June 6, 1994 LEANN MORSE, NOTARY PUBLIC VAN BUREN COUNTY, STATE OF MICHIGAN MY COMMISSION EXPIRES 06-06-94