



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

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

G B Slade
General Manager

November 20, 1990

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATIONS CHANGE REQUEST - CONTAINMENT PENETRATIONS DESCRIPTION -
REVISION 1

Enclosed is a request for change to the Palisades Technical Specifications which modifies the descriptions of the steam generator blowdown lines and the line sizes. The original change, submitted September 20, 1990, has been modified to incorporate verbal comments from the NRC Project Manager. This revision adds a footnote denoting that the penetration valves for the affected penetrations have remained at their original size and modifies the discussion and No Significant Hazards Determination. No Technical Specifications Limiting Conditions for Operation or Surveillances have been altered by this change request. The blowdown lines will be modified in the 1990 refueling outage.

Consumers Power Company requests the amendment become effective upon issuance.

for 
Gerald B Slade
Plant Manager

CC 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 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

In Table 3.6.1, Containment Penetrations and Valves, make the following changes:

- A. For Penetrations No. 5 and 6, change the system name and service line size from "...BOTTOM BLOWDOWN (2")" to "...BLOWDOWN (4") *", and add footnote "* penetration line size; isolation valves are 2-inch."
- B. For Penetrations 16, and 55 change system name and service line size from "...SURFACE BLOWDOWN (2")" to "...RECIRCULATION (4") *", and add footnote "* penetration line size; isolation valves are 2-inch."

II. Discussion

The above proposed Technical Specifications changes are requested due to modifications being made during the 1990 refueling outage. The existing steam generator bottom blowdown 2-inch piping from the steam generators up to the containment isolation valves, outside containment, is being replaced with 4-inch piping. The existing steam generator surface blowdown 2-inch piping from the steam generators up to the containment isolation valve, outside containment, is also being replaced with 4-inch piping. The steam generator's surface blowdown function will no longer be used as the line will only be used for recirculation during cold shutdown, hence the changes in the line name to steam generator recirculation system. Since the "bottom" blowdown lines will serve as the only steam generator blowdown lines the "bottom" designation has been removed.

As noted above, the containment isolation valves will remain at their current 2-inch size. The modifications being performed during the 1990 refueling outage are the initial changes planned to increase the capacity of both the steam generator blowdown and recirculation capabilities. The modifications to these lines extending from the containment isolation valves, outside containment, are presently planned to be made at a future outage.

The changes to the Technical Specifications only affect the system name and line size designations in the containment penetration and valve table. The actual modifications to the plant are being made under Consumers Power Company approved facility changes and 10 CFR 50.59 safety evaluations.

Analysis of No Significant Hazards Consideration

- (1) Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

No. The proposed changes to the containment penetration lines are being made under CPCo approved facility changes in accordance with 10 CFR 50.59. Changes to the Technical Specifications are to the system name and service line size and have identified that the isolation valves have not changed size. The containment penetration lines and penetrations are being designed, installed and tested in accordance with existing design and licensing basis requirements, including, but not limited to seismic and High Energy Line Break (HELB) requirements. The operability and surveillance requirements for the containment isolation valves and functional requirements also have not changed due to the modifications. Therefore, the change does not involve a significant increase in the probability of an accident previously evaluated.

The change does not involve a significant increase in the consequences of an accident because a break in the new 4-inch pipe inside or outside containment is no more severe than other breaks that could occur. Also an ILRT will be performed following the modifications to the containment penetrations to ensure 10 CFR 50, Appendix J, requirements are met.

- (2) Does this change create the possibility of a new or different kind of accident from any previously evaluated?

No. The modifications only affect changing the existing piping and penetrations from 2-inches to 4-inches. No new design features or parameters are introduced. The FSAR design considerations including seismic and HELB remain the same. The function of the containment isolation valves remains the same as do the Technical Specifications operability and surveillance requirements. Therefore, a new or different kind of accident has not been created.

- (3) Does this change involve a significant reduction in a margin of safety?

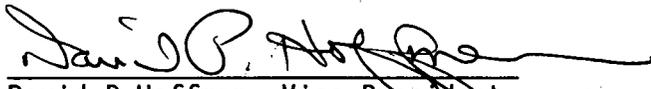
No. The functional requirements and Technical Specifications requirements for the isolation valves remain the same. The design of the lines and penetrations meet the same requirements as specified in the licensing basis. The consequences of a break in the lines are not greater than previously analyzed events. Therefore, the change does not involve a significant reduction in the margin of safety.

III. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that 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 Department. 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 21st day of November 1990.


Elaine E Buehrer, Notary Public
Jackson County, Michigan
My commission expires October 11, 1993