



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 13, 1991

Docket No. 50-255

Mr. Gerald B. Slade
Plant General Manager
Palisades Plant
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - INSTRUMENT AND CONTROLS TECHNICAL SPECIFICATION
CHANGE (TAC NO. 79933)

By letter dated February 27, 1991, Consumers Power Company requested numerous changes to Section 3.17 of the Technical Specifications. The proposed changes would:

- expand the Applicability section of TS 3.17,
- clarify operability and bypass requirements of the associated instrumentation, and
- expand the Basis statements for the Reactor Protective System.

Some of the changes were submitted to resolve inconsistencies described in Licensee Event Report (LER) 91-001. The other changes were proposed in order to clarify the operating requirements for the Instrument and Control systems, which include Reactor Protective System (RPS) and Engineered Safety Features Actuation System (ESFAS) instrumentation.

This letter documents conversations I have had with your Licensing staff on April 17, May 2, and May 6, 1991 regarding this license application. In summary, Sections II and III of your submittal (Discussion and Analysis of No Significant Hazards Consideration), do not contain adequate explanation and/or justification to facilitate a timely review. One example which supports this determination is that your letter does not adequately describe the change in applicability for the instrumentation in Table 3.17.1-4. Additionally, this change in applicability is not adequately addressed in your analysis of no significant hazards consideration. Several additional examples were provided to your Licensing staff, who committed to supersede your February 27, 1991 license application with a revised submittal.

There is one additional, related matter that was discussed with your staff on May 6, 1991. The Palisades Senior Resident Inspector and myself have been reviewing your Technical Specifications and related licensing information to determine the acceptability of your practice of allowing long term operation of the four channel Reactor Protective System and Engineered Safety Features Actuation System in a 2 out of 3 logic configuration (e.g., NI-005 was in bypass for a number of months last refueling cycle).

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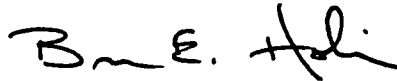
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May 13, 1991

On June 25, 1982 you submitted a Technical Specification change request which limited the length of time one channel of RPS and/or ESFAS could remain in the "bypass" mode. Coincidentally, this license application also submitted a clarification to the instrument bypass conditions described in LER 91-001. You requested to withdraw this license application by letter dated January 24, 1989, which committed to maintain the technical requirements of withdrawn Technical Specifications active through administrative controls until approval was obtained for Restructured Technical Specifications. The NRC staff requests that you evaluate your commitments as stated in the January 24, 1989 letter, ensuring that your administrative procedures for maintaining the requirements of the withdrawn technical specifications are being maintained. We request that you discuss the results of this evaluation with myself and the Senior Resident Inspector.

Per my discussion with your Licensing staff it is my understanding that your resubmittal of the February 29, 1991 license application will address the RPS/ESFAS continuous bypass issue. The staff recognizes the need to clarify these instrument specifications and will support a timely review as requested in your original submittal.

Sincerely,



Brian E. Holian, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

May 13, 1991

On June 25, 1982 you submitted a Technical Specification change request which limited the length of time one channel of RPS and/or ESFAS could remain in the "bypass" mode. Coincidentally, this license application also submitted a clarification to the instrument bypass conditions described in LER 91-001. You requested to withdraw this license application by letter dated January 24, 1989, which committed to maintain the technical requirements of withdrawn Technical Specifications active through administrative controls until approval was obtained for Restructured Technical Specifications. The NRC staff requests that you evaluate your commitments as stated in the January 24, 1989 letter, ensuring that your administrative procedures for maintaining the requirements of the withdrawn technical specifications are being maintained. We request that you discuss the results of this evaluation with myself and the Senior Resident Inspector.

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Sincerely,

original signed by Brian Holian

Brian E. Holian, Project Manager
 Project Directorate III-1
 Division of Reactor Projects III/IV/V
 Office of Nuclear Reactor Regulation

cc: See next page

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Palisades Plant

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