



**Consumers
Power**

POWERING

MICHIGAN'S PROGRESS

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

May 28, 1991

G B Slade
General Manager

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -

TECHNICAL SPECIFICATIONS CHANGE REQUEST - INSERVICE INSPECTION PROGRAM FOR
SHOCK SUPPRESSORS (SNUBBERS)

Enclosed is a request for change to the Palisades Plant Technical Specifications to incorporate a change to the inservice inspection program for shock suppressors (snubbers).

Attachment 1 of this submittal contains the proposed Technical Specifications pages and Attachment 2 has the existing Technical Specifications pages marked up to show the proposed changes. It is requested that this change be made effective upon issuance.

Gerald B Slade
General Manager

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

Attachments

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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 Facility Operating License DPR-20, Docket 50-255, issued to Consumers Power Company on February 21, 1991, for the Palisades Plant be changed as described in Section I below:

I. Changes

Change Section 4.16.1 as follows:

Replace the existing Section 4.16.1, Section 4.16.1(a) and Section 4.16.1(b) with new sections as shown in Attachment 2:

II. Discussion

This change to the Palisades Plant Technical Specifications is being initiated as a result of NRC Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." Generic Letter 90-09 discusses how the present snubber inspection interval schedule is based on the number of snubber failures from the previous visual inspection with no regard to the total number of snubbers inspected. The existing requirements have created numerous hardships for utilities having large snubber populations. Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the existing visual inspection schedule.

To alleviate this situation, the NRC has developed an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective actions during plant outages. Because this technical specification improvement will reduce future occupational radiation exposure and is highly cost effective, the alternative inspection schedule is consistent with the NRC's statement on technical specification improvements.

The new inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. A snubber is considered unacceptable if it fails the acceptance criteria of the visual inspection. The new inspection schedule could allow up to 48 months between inspection intervals, depending on the number of unacceptable snubbers found during the previous inspection. In addition, the new inspection schedule will not penalize the utility

by imposing extremely short inspection intervals when a few snubbers are found unacceptable.

It has been concluded that it would be in our best interest to implement this technical specifications change at Palisades since the potential for snubber failure does exist and complying with the present schedule could cause unnecessary and frequent plant shutdowns.

III. Analysis of No Significant Hazards Consideration

Consumers Power Company finds that activities associated with this proposed technical specifications change involve no significant hazards; and accordingly, a no significant hazards determination per 10CFR50.92(c) is justified. The following evaluation supports the finding that the proposed changes would not:

1. Involve a significant increase in the possibility or consequences of an accident previously evaluated.

The proposed technical specifications does not involve a significant increase in the possibility or consequences of an accident previously evaluated. A safety related snubber is considered a passive device which is called upon to perform during a seismic or dynamic event, the failure of a snubber would have no effect on the probability of an accident.

The consequences of an accident previously evaluated in the FSAR will not be increased by changing the snubber visual inspection schedule in Technical Specification 4.16.1.a. All safety related snubbers at Palisades are subjected to visual and functional testing. Functional testing provides a 95 percent confidence level that 90 to 100 percent of the snubbers will operate within the specified acceptance limits. The performance of visual examinations complement the functional testing program and provides additional confidence in snubber operability. The existing snubber visual inspection schedule is based on the number of inoperable snubbers found during the previous inspection period with no regard to the total number of snubbers inspected. The new inspection schedule will still depend on the number of inoperable snubbers found during the previous inspection, however, it will have the added advantage of being based on the percentage of the total number of snubbers inspected. Since the same confidence level as the existing schedule is maintained, it is concluded that the probability of a snubber failure, as a result of imposing this new inspection schedule, will not be increased. If the probability of a snubber failure will not increase, it can also be concluded that the consequences of an accident will not increase.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed technical specifications change does not create the possibility of a new or different kind of accident from any previously evaluated. The change does not introduce any new equipment into the plant or require any existing equipment to be operated in a manner different than that in which it was designed to be operated. A safety related snubber is considered a passive device which is called upon to perform during a seismic or dynamic event, therefore, the failure of a snubber would have no effect on the possibility of an accident. Imposing a new inspection schedule will have no effect on the method or thoroughness of the snubber inspections. The new schedule is an administrative control only. Therefore, the possibility of a malfunction of a different type than any previously evaluated in the FSAR will not be created.

3. Involve a significant reduction in the margin of safety.

The proposed technical specifications change does not involve a significant reduction in the margin of safety. This change to the snubber inspection schedule maintains the same confidence level of snubber operability as the existing schedule and replaces it. As stated previously, the functional testing of the snubbers provides a 95 percent confidence level that 90 to 100 percent of the snubbers will operate within the specified acceptance limits. Therefore, the margin of safety as defined by plant licensing bases will not be reduced.

IV. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specifications Change Request and has determined that this change does not involve an unreviewed safety question. Further, the change involves no significant hazards consideration. This change has been reviewed by the Nuclear Safety Services Department. A copy of this Technical Specifications 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 Specifications Change Request are truthful and complete.

By _____
David P Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this ____ day of _____ 1991.

Notary Public
, Michigan
My commission expires October 11, 1993