Consumers Power
POWERING MICHIGAN'S PROGRESS
Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

G B Slade
*General Manager*

June 12, 1992

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - TECHNICAL SPECIFICATIONS CHANGE REQUEST - ELECTRICAL SYSTEMS, ACTION STATEMENT

Enclosed is a request for a change to the Palisades Technical Specifications to better coordinate the Required Action statement of the Electrical Systems specification with the Limiting Condition for Operation.

This change is necessary to allow testing and loading of the Diesel Generators when the plant is above 325°F, but not yet critical.

Attachment 1 to the change request contains the proposed Technical Specifications page and Attachment 2 contains the affected existing Technical Specifications page marked to show the proposed change.

It is requested that this change request be made effective upon approval.

Gerald B Slade
General Manager

CC Administrator, Region III, USNRC
Resident Inspector, Palisades

Attachments

A001 1/1

9206250221 920612
PDR ADOCK 05000255
P PDR

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 below:

I. Change

It is proposed that Specification 3.7.2 be changed to delete the qualifying phrase "after the reactor has been made critical" from specification 3.7.2.

Existing Specification 3.7.2 with subject phrase highlighted:

> The requirements of Specification 3.7.1 may be modified to the extent that one of the following conditions will be allowed after the reactor has been made critical. If any of the provisions of those exceptions are violated, the reactor shall be placed in a hot shutdown condition within 12 hours. If the violation is not corrected within 24 hours, the reactor shall be placed in a cold shutdown condition within 24 hours.

II. Discussion

The existing Electrical Systems specification, 3.7.1, is applicable when the primary coolant system is above 325°F. The existing associated action statement, 3.7.2, applies only when the reactor is critical. Therefore strict interpretation of these two specifications would allow required electrical components to be inoperable, for the specified time periods, with the reactor at power, but not when the reactor was shutdown at Hot Shutdown or Hot Standby. This limitation precludes the test loading of the diesel generators when the plant is subcritical above 325°F. and could require an LCO 3.0.3 entry, while in Hot Shutdown for a condition which would be allowable while at full power.

A similar change to Specification 3.7.2 was proposed, along with other changes to the Electrical Systems specifications, on March 25, 1986. That Technical Specifications change request and several others were withdrawn on January 24, 1989 with the understanding that their content would be incorporated in a Palisades submittal of Restructured Technical Specifications. The delay in the Restructured Technical Specifications program and the recent decision that it was necessary to declare the diesel generators inoperable while they are operating in parallel, make it desirable to correct Specification 3.7.2 as soon as possible.

The proposed change is consistent with the equivalent Action Statements of the CE Standard Technical Specifications, NUREG 0212.

III. Analysis of No Significant Hazards Consideration

Consumers Power Company finds the 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 operation of the facility in accordance with the proposed change would not:

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

   The proposed change to the Technical Specifications has no effect when the plant is cooled below 325°F or when the reactor is critical. It would allow plant operation, on those occasions when the plant is above 325°F with the reactor subcritical, for specifically limited Allowed Outage Times, with less operable electrical equipment operable than is currently required. However, the change would eliminate a requirement to make a plant cooldown from Hot Shutdown due to an equipment inoperability for which Power Operation would be allowed to continue, and would also allow performing required testing of the Diesel Generators during Hot Shutdown.

   Therefore, operation of the facility in accordance with the proposed change to the Technical Specifications would not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

   The proposed change to the Technical Specifications would not alter any plant systems, equipment, or operating practices. The change allows conditions which are currently allowed with the reactor critical at any licensed power level, with the reactor subcritical.

   Therefore, operation of the facility in accordance with the proposed change to the Technical Specifications would not create the possibility of a new or different kind of accident from any previously evaluated.

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

   Operation of the facility in accordance with the proposed change to the Technical Specifications would not alter the capacity or settings of any plant equipment. It would not cause or allow the plant to be operated in any conditions which are less conservative than those allowed by existing Technical Specifications.

   Therefore, the proposed change to the Technical Specifications would not involve a significant reduction in a margin of safety.

IV. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specifications Change Request and has determined that the change involves no significant hazards consideration. This change has been reviewed by the Nuclear Performance Assessment 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
David P Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 12 day of June 1992.

LeAnn Morse
Notary Public
Van Buren Co, Michigan
My commission expires 6/6/94