



**Consumers
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POWERING

MICHIGAN'S PROGRESS

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

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General Manager

September 3, 1993

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - TECHNICAL SPECIFICATION
CHANGE REQUEST - REVISION TO RADIAL PEAKING FACTOR LIMITS FOR CYCLE 11

Enclosed is a request for a change to the Palisades Technical Specifications to modify the radial peaking factor limits in Table 3.23-2. The changes are made to incorporate the appropriate limits for the modified "L" fuel assemblies that have recently been installed in the reactor during the present refueling outage after the discovery of a failed fuel rod in an "I" fuel assembly forced a core reconfiguration. In this change request, we have deleted the unnecessary reference to the number of fuel rods in an assembly and updated the bases to reflect the revision to analytical reports that have been made since the issuance of Amendment 156 which was originally approved to support operation in Cycle 11.

Technical Specification 3.23.2 is applicable above 25 percent rated power, and therefore, we request that the NRC expedite the review of this proposed change in accordance with the provisions of 10CFR50.91(a)(5). The basis for consideration, for granting an emergency amendment describing why the situation occurred and why the situation could not be avoided, is provided below.

On July first, following review of video tape taken during an inspection with a remote camera in the reactor cavity tilt pit, the NRC was notified of the possibility that a broken fuel rod was located in the tilt pit. Further inspection led to the verification of a broken fuel rod being in the tilt pit. The fuel rod came from fuel assembly I-24 which was located in the reactor.

Subsequent investigation and evaluation led to an eventual plan to reconfigure the reactor core that included a selection criteria and appropriate justification. This justification was provided in Consumers Power Company's August 16, 1993 reply to the NRC's request for additional information and in our revised Cycle 11 core design 10CFR50.59 evaluation which has been reviewed by the NRC staff during their inspection from August 19, 1993 to August 21, 1993. In the exit meeting following that inspection the NRC suggested that changes be made to clarify the Technical Specifications with regard to the

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peaking factor limits for the reconstituted "L" fuel assemblies in Table 3.23-2. Further NRC staff review has resulted in the determination that appropriate Technical Specifications controls are necessary prior to startup of the plant and reaching 25 percent of rated power which in the present schedule would be the day the plant is returned on-line, September 22, 1993.

Our internal review of the potential need for a Technical Specifications amendment had recognized that no safety significance existed with the peaking factors associated with the "L" fuel assemblies which are located in the core periphery. Our review failed to consider that even though the "L" fuel was located in a low power region of the core there were no specific peaking factor limits identified for these reconstituted fuel assemblies. Upon agreement with the consideration of the need for a Technical Specifications amendment we have compiled the necessary documentation to accompany the amendment request. Failure to have an approved amendment in place by the time the plant is returned on-line would result in the prevention of resumption of power operation. We have concluded that this amendment request does not involve a significant hazards consideration and have documented that determination in the enclosed change request.

The following attachments are in support of the request:

- 1) Proposed Technical Specifications pages;
- 2) Existing Technical Specifications pages marked to show the proposed changes;
- 3) EMF-92-178, Revision 1, Palisades Cycle 11: Disposition and Analysis of Standard Review Plan Chapter 15 Events.
- 4) Siemens letter to RJ Gerling, dated September 2, 1993.

In order to assure that there is no misunderstanding caused by the designation of fuel assembly types used in our proposed Technical Specifications or in the Siemens reports, we note:

- a) Fuel assemblies are referred to by the reload when they were first used. As an example, Reload L assemblies were first used in the core during that reload. Reload L, M, N, and O assemblies are being used in the upcoming Cycle 11.
- b) Fuel assembly types are also described by reference to the number of fuel rod positions. All currently installed assemblies have 216 rod positions. Some earlier assemblies, notably the "Reload I"s, provided for installation of an 8 rod hafnium cluster, and had only 208 fuel rod positions. Therefore the designation of "216 rods" does not exclude those assemblies equipped with some stainless steel replacement rods.

We request that this change be made effective upon issuance.


Gerald B Slade
General Manager

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

Attachments