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

Kurt M. Haas

Plant Safety and Licensing Director

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Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
TECHNICAL SPECIFICATIONS CHANGE REQUEST - ONE TIME DEFERRAL OF REFUELING
INTERVAL SURVEILLANCE

A request for a change to the Palisades Technical Specifications is enclosed. This Technical Specification change request (TSCR) proposes a one time deferral of several 18-month interval surveillance tests until the scheduled refueling outage to avoid the necessity of imposing a plant shutdown and cooldown solely for the sake of their performance.

Each of these tests was performed satisfactorily during the last refueling outage (June 4, 1993 to November 8, 1993). Due to intervening maintenance outages early in the cycle, the start of the upcoming refueling outage will occur more than 22½ months (18 months + 25%) after the last performance of these tests. The earliest two of these tests, both calibrations of PCS leak detection instruments, are currently due to be performed by March 20 and March 22, 1995, taking credit for the 25% allowance of Specification 4.0.2. If those surveillance tests were not performed, Technical Specifications would require a plant shutdown 30 days after the second channel was declared inoperable, which would be on or before April 21, 1995. The refueling outage is currently scheduled to start on May 28, 1995.

It was recognized, prior to our startup from the spring 1994 maintenance outage, that if no forced outage occurred during the remainder of this fuel cycle, these Technical Specifications changes would be required. At that time, the probability of such an extended run, considerably longer than any yet experienced at Palisades, was quite low. It was believed that if the restart was delayed to perform the subject testing, the start of the refueling outage would be similarly delayed. That delay would produce a new set of tests which could come due prior to the planned refueling date. Since the necessity of a TS change would only arise in the event of an unusually long continuous run, the decision was made, and discussed with both the Senior Resident Inspector and the NRR Project Manager, to restart the plant and seek a TS change if necessary.

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A review of the results of the past two performances of the instrument tests indicates that none of the instrument settings would be expected to exceed the Technical Specifications limits with the proposed extension. With the exception of the containment pressure sensing switches and the Safety Injection Refueling Water Tank (SIRWT) level detectors, there are multiple instrument channels for each safety system actuation function. Channel Checks, performed on these channels each shift, would disclose any significant change of instrument channel calibration. The containment pressure switches have not had a history of significant drift. The level detectors for the SIRWT are capacitance probes suspended on cables from the top of the tank; setpoint drift is unlikely.

Recent snubber testing experience shows no failures since an enhanced rebuilding and replacement program was initiated in 1988. The testing to be deferred involves one mechanical snubber (out of a total of five in the plant); and two hydraulic snubbers (out of a total of ten in the plant).

The following attachments are included:

- 1) Proposed Technical Specifications pages
- 2) A Table of Surveillance Requirements to be Deferred.

The first of the subject Surveillance Requirements is currently required to be performed no later than March 20, 1995; operation may continue, in accordance with TS action statements, until April 21, 1995. It is requested, therefore, that this TSCR be approved prior to April 15, 1995, and become effective upon approval.

Summary of Commitments:

This letter does not make or alter any commitments to the NRC.



Kurt M. Haas
Director, Plant Safety & Licensing

CC Administrator, Region III, USNRC
Resident Inspector, Palisades
State of Michigan

Attachments