

CONSUMERS POWER COMPANY  
Docket 50-255  
Request for Change to the Technical Specifications  
License DPR-20

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. Changes

- a. Specification 4.1.2, an 18 month calibration of the PORV actuation instrument channels, has been modified by the addition of a footnote "For Cycle 11 only, this surveillance need not be performed until prior to startup for Cycle 12."
- b. The text of Specification 4.16 has been rearranged on pages 4-71 through 4-74a to eliminate empty spaces; page 4-71a has been eliminated; and the sole existing footnotes, numbers 3 and 4, have been renumbered as 1 and 2.
- c. Specification 4.16.1.c, an 18 month functional test of safety-related snubbers, has been modified by the addition of a footnote "For Cycle 11 only, this surveillance need not be performed until prior to startup for Cycle 12."
- d. Specification 4.17, Instrumentation Systems Surveillance Requirements, has been modified by the addition of a footnote "For Cycle 11 only, surveillance requirements marked with an asterisk (\*) need not be performed until prior to startup for Cycle 12." The affected surveillance requirements in tables 4.17.1 through 4.17.6 have been marked with an asterisk.
- e. The reference to footnote "c" in line 18 of Table 4.17.6 (page 4-82) and the footnote identifier were changed from "c" to "d".

II. Discussion

The proposed footnote wording "For Cycle 11 only, . . . need not be performed until prior to startup for Cycle 12." is similar to the wording used in Palisades License Amendment 77, which was made for similar reasons. No stipulation was proposed to require performance of the subject surveillance if a forced outage does occur between the approval of this TSCR and the refueling outage, since such performance would delay the subsequent restart and initiate the regenerative cycle of more and more surveillance requirements coming due prior to the refueling for each testing delay.

Changes "a", "c", and "d" allow deferring surveillance testing to avoid a plant shutdown and cooldown solely to perform these required tests. The deferred testing must be completed prior to startup from the 1995 refueling outage.

Changes "b" and "e" are editorial changes only.

Change "b" eliminates an unnecessary page and rearranges the test more neatly on the remaining pages. The 4.16 basis section is separated from the Technical Specification itself. The footnotes were renumbered following the former deletion of footnotes 1 and 2.

Change "e" re-letters the footnote on the second page of Table 4.17.6 to avoid having two different footnotes for that table (although on separate pages) each identified as "footnote (c)".

### III. Analysis of No Significant Hazards Considerations

Consumers Power Company finds the activities associated with this Technical Specifications (TS) change involve no significant hazards and accordingly, a no significant hazards determination per 10 CFR 50.92(c) is justified. The following evaluation supports the finding that operation of the facility in accordance with the proposed TS would not:

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

Deferring surveillance testing will introduce no new operating conditions, change no equipment operating procedures, and change no plant systems or equipment. Therefore, operation of the facility in accordance with the proposed TS would not result in a significant increase in the probability of an accident previously evaluated.

Deferring surveillance testing of snubbers and instrument channels could allow minor degradations of snubber condition or small changes in instrument setpoints or calibration to progress some amount beyond that point which would occur with a shorter surveillance interval. A review of the recent test history for the subject surveillance indicates that no significant snubber degradation or instrument drift was found. It is not expected that, even with the proposed surveillance deferral, snubber conditions or instrument settings will be found to exceed conditions allowable by the Technical Specifications. Therefore, operation of the facility in accordance with the proposed TS would not result in a significant increase in the consequences of an accident previously evaluated.

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

Deferring surveillance testing will introduce no new operating conditions, change no equipment operating procedures, and change no plant systems or equipment. Therefore operation of the facility in accordance with the proposed TS 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.

A review of past performance of the subject surveillance tests indicate that the requested deferral of testing would not have a significant effect on the results of the tests when they are performed prior to the startup for cycle 12. Most of the affected instrumentation is monitored each shift by Channel Checks, which would disclose major failures or significant drift. Therefore, operation of the facility in accordance with the proposed TS 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.

## CONSUMERS POWER COMPANY

To the best of my knowledge, the contents of this Technical Specifications change request, deferring several 18 month interval surveillance requirements until the upcoming refueling outage, are truthful and complete.

By David W. Joos  
David W. Joos, Executive Vice President  
& Chief Operating Officer - Electric

Sworn and subscribed to before me this 9th day of February 1995.

Marla A. Fall  
Marla A. Fall, Notary Public  
Jackson County, Michigan  
My commission expires July 20, 1999

[SEAL]