



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

Kurt M. Haas
Plant Safety and Licensing Director

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043
Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

May 1, 1995

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - TECHNICAL SPECIFICATIONS
CHANGE REQUEST - DIESEL GENERATOR TESTING**

A request for a change to the Palisades Technical Specifications (TS) is enclosed. This change proposes requirements in TS section 4.7 for periodic Diesel Generator (DG) peak load tests. The existing DG load testing requirements, unaltered since the initial issue of the operating license in 1971, stipulate a testing load range which does not verify that the DG is capable of supplying the calculated peak accident loads.

The attached change request provides a description and discussion of each proposed change. In addition to the change request, two attachments have been included.

- 1) The Proposed Technical Specifications page.
- 2) Existing Technical Specifications page, marked to show the changes.

In order to provide time for procedure preparation and completion of the newly proposed surveillance testing, it is requested that the Amendment associated with this Technical Specification change request not be required to be fully implemented before December 1, 1995.

SUMMARY OF COMMITMENTS

This letter completes the commitment discussed in our February 13, 1995 letter on this subject.

Kurt M. Haas,
Plant Safety and Licensing Director

CC Administrator, Region III, USNRC
Resident Inspector, Palisades

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Attachments

ADD 1

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 Proposed:

- A. The "Applicability" and "Objective" statements have been deleted.
- B. The monthly DG testing requirement, 4.7.1a, has been revised to require a demonstration that each DG can supply the predicted peak accident loads.
- C. The wording of requirement 4.7.1d was altered to clarify the intent of that requirement.

II. Discussion of Proposed Changes:

- A. The existing "Applicability" (Applies to periodic testing and surveillance requirements of the emergency power system) and "Objective" (To verify that the emergency power system will respond promptly and properly when required) statements were deleted since they provide no useful benefit.

No similar statements appear in the STS. The conditions under which the specified testing must be performed, which are not discussed in the existing "Applicability" statement, are specified in the existing general surveillance requirement 4.0.1:

Surveillance requirements shall be applicable during the reactor operating conditions associated with individual Limiting Conditions for Operation unless otherwise stated in an individual surveillance requirement.

- B. The existing monthly DG testing requirement is unchanged from initial issuance of the Facility Operating License in 1971. Since that time, the predicted accident loads imposed on the DGs have increased to the point where the required monthly testing no longer demonstrates that each DG can carry its predicted accident loading.

Existing requirement 4.7.1a contains three parts:

Each diesel generator shall be manually started each month and demonstrated to be ready for loading within 10 seconds.

The signal initiated to start the diesel shall be varied from one test to another to verify that A and B starting circuits are operable.

The generator shall be synchronized from the control room, and loaded to 2400 ±100 kW

The requirements of the first and third sentences are contained within the revised wording, with the exceptions of the specified manual

starting and synchronization from the control room. These two details are not specified in the proposed wording (nor in the STS) because no other practical alternative exists.

The requirements of the second sentence are not included in the proposed wording. Since the DG is not assumed to be single failure proof, the detail of verifying that both of the starting circuits function will be left to the testing procedure, as is done in STS.

The proposed testing requirement is taken from the Standard Technical Specifications, NUREG 1432, (STS) with only slight changes. The proposed wording combines STS surveillance requirements (SRs) 3.8.1.2, 3.8.1.3, and 3.8.1.7.

The achievement of 2000 Volts in 10 seconds is specified since that is the setting of the voltage sensing relays which initiate DG breaker closure, and which are used to time successful starting.

The proposed voltage range is based on the DG rating of 2400 \pm 5% Volts. This provides adequate margin for the switchgear and the safeguards motors.

The proposed minimum frequency is based on the accident analyses, rather than on electrical limitations. The accident analyses made no specific allowance for the safeguards pumps being operated at other than design speed. When analytical results are available to confirm the acceptability of reduced frequency operation, a change to this limit may be proposed.

The proposed maximum frequency is based on the STS, and conform to the guidance of Regulatory Guide 1.9.

The proposed testing load requirement wording was chosen because the peak predicted accident load is different for each DG, and includes not only automatically connected loads, but those operator connected loads which might be necessary under some circumstances. The predicted accident load profile, when potential operator connected loads are included, exceeds the continuous rating of the DG (but remains within the overload ratings) for a short period of time early in the event. By specifying that the DG be "loaded above the peak accident loading" for 15 minutes, the ability of the engine to supply this possible peak load is demonstrated, yet the DG is not routinely loaded over its continuous rating for a lengthy period. The 2300 to 2500 kW load range proposed for the balance of the monthly test is unchanged from the existing requirements.

The proposed DG load testing interval is unchanged from existing requirements.

- C. The wording of requirement 4.7.1d was clarified. The existing wording could have been interpreted to be a prohibition of ever loading the DG above its continuous loading. This item is intended to provide the same requirement as item 4.8.1.1.2.d.9 of the former STS, NUREG 0212. The wording was altered to clarify that the requirement was a periodic test, that it was to be accomplished by analytical means rather than by physical testing, and that it was to be performed each 18 months. The proposed frequency is the same as that in NUREG 0212.

IV. 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 to the Technical Specifications would not:

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

The proposed change does not alter any plant operating conditions, operating practices, equipment settings, or equipment capabilities. Therefore, operation of the facility in accordance with the proposed change will not involve an increase in the probability of an accident.

The proposed change involves requiring more rigorous testing of the DGs than required by the existing Technical Specifications. The more rigorous testing is intended to provide additional assurance that the DGs are capable of performing their design function and should, therefore, involve a reduction, rather than an increase, in the consequences of those accidents previously evaluated.

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

The proposed change does not alter any plant operating conditions, operating practices, equipment settings, or equipment capabilities. Therefore, operation of the facility in accordance with the proposed change will 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.

The proposed change involves requiring more rigorous testing of the DGs than required by the existing Technical Specifications. The more rigorous testing is intended to provide additional assurance that the DGs are capable of performing their design function and should, therefore, involve an increase, rather than a reduction, in the margin of safety.

V. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specifications Change Request and has determined that proposing 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 Performance Assessment Department.

CONSUMERS POWER COMPANY

To the best of my knowledge, the contents of this Technical Specifications change request, describing proposed changes which proposes requirements in TS section 4.7 for periodic Diesel Generator load tests, are truthful and complete.

By Robert A. Fenech
Robert A. Fenech, Vice President
Nuclear Operations

Sworn and subscribed to before me this 1ST day of MAY, 1995.

Alora M. Davis

Alora M. Davis, Notary Public
Berrien County, Michigan
(Acting in Van Buren County, Michigan)
My commission expires August 26, 1999

[SEAL]

