



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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

April 4, 1996

U S Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT CONVERSION TO
STANDARD TECHNICAL SPECIFICATIONS; CLOSURE OF COMMITTED ACTION.**

On March 29, 1996, Consumers Power Company submitted a Technical Specifications change request (TSCR) which will upgrade the Palisades Technical Specifications (TS) to emulate the Standard Technical Specifications for Combustion Engineering Plants, NUREG 1432, Revision 1 (STS). That submittal completed several committed actions. This letter is intended to document completion of those items.

Our October 28, 1994, letter discussing the planned TSCR contained a list of 13 previously committed action items which would be completed by conversion to STS. A copy of that list has been attached. The proposed LCO in our March 29, 1996 TSCR which addresses each item in the attached list is identified below:

- Item 1: Addressed by proposed LCOs 3.8.7 and 3.8.8 (Inverters - Operating and Shutdown), and by LCOs 3.8.9, and 3.8.10 (Distribution Systems - Operating and Shutdown).
- Item 2: Addressed by proposed LCO 3.3.5 (Diesel Generator Undervoltage Start).
- Item 3: Addressed by proposed LCOs 3.8.9 and 3.8.10 (Distribution Systems - Operating and Shutdown), and by LCOs 3.8.1 and 3.8.2 (AC Sources - Operating and Shutdown).
- Item 4: Addressed by proposed LCO 3.8.1, (AC Sources - Operating) Condition E (Two DGs inoperable).

9604120070 960404
PDR ADOCK 05000255
P PDR

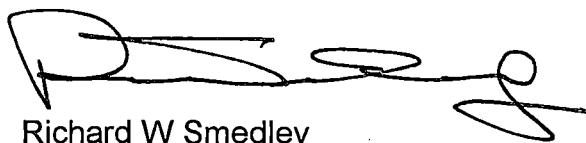
120027

*Acc
4/11*

- Item 5: Addressed by proposed LCO 3.8.3 (Diesel Fuel Oil and Lube Oil).
- Item 6: Addressed by proposed LCOs 3.7.10 and 3.7.11 (Control Room Ventilation - Filtration and Cooling).
- Item 7: Addressed by proposed LCO 3.3.1 (Reactor Protective System Instrumentation), Condition G (Control Room Temperature > 90°F).
- Item 8: Addressed by proposed LCO 3.6.7 (Containment Spray and Cooling) Surveillance Requirement 3.6.7.4 (Verify Spray Header Level).
- Item 9: Addressed by proposed LCO 3.6.6 (Containment Air Temperature).
- Item 10: Addressed by proposed LCO 3.5.3 (ECCS - Shutdown).
- Item 11: Addressed by proposed relocation of the Concentrated Boric Acid requirements currently contained in TS 3.2 (Chemical and Volume Control System).
- Item 12: Addressed by proposed Administrative Control Section Program 5.5.2 (Primary Coolant Sources Outside Containment).
- Item 13: Addressed by proposed LCO 3.4.2 (PCS Minimum Temperature for Criticality), Condition A (T_{ave} not within limit).

SUMMARY OF COMMITMENTS

This letter establishes no new commitments. It documents the completion of several existing commitments listed in our October 28, 1994, letter by the submittal of a Technical Specification change request for conversion to STS dated March 29, 1996.



Richard W Smedley
Manager, Licensing

CC: Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

Enclosure

ENCLOSURE 1

**CONSUMERS POWER COMPANY
PALISADES PLANT
DOCKET 50-255**

Copy of Attachment to Consumers Power Letter of October 28, 1994

Item	Letters [NRC LTR]	COMMITTED ACTION
	06/30/94	<p>On 06/30/94, CPCo informed the NRC that Palisades intends to submit a Technical Specifications (TS) change request which will upgrade Palisades TS and their bases to emulate, as closely as possible, the Standard Technical Specifications for Combustion Engineering Plants, NUREG-1432 (STS).</p> <p>This conversion to STS will accomplish the following TS corrections and updates:</p>
1	08/24/88	<p>The Palisades TS do not address the inverters which supply the Preferred AC (Vital AC) buses, although the preferred AC buses are addressed. In 1988 it was recognized that operation with a certain Preferred AC bus powered from the alternate supply could affect the ability to meet the single failure criterion. Administrative controls were instituted to limit the time for such operation, and a commitment was made to revise the TS accordingly during the Restructured Technical Specification rewrite. The CE STS address both inverters and "Vital AC" buses.</p>
2	01/24/89 [12/22/81 SEP SER]	<p>On 01/24/89, CPCo requested withdrawal of a TS change request, among several others, involving Undervoltage Protection in response to SEP topic VIII-1.A. At that time a commitment was made to factor these limitations into the Restructured Technical Specification conversion.</p>
3	01/24/89	<p>On 01/24/89, CPCo requested withdrawal of a TS change request, among several others, involving redistribution of safety related electrical loads among existing and newly installed 480 VAC electrical buses. The withdrawal request contained a commitment to include the appropriate requirements from the Electrical TS change request of 04/10/84 & 03/26/86 into the Restructured Technical Specifications.</p>
4	02/10/94 12/23/93 LER 93-13	<p>This commitment is from LER 93-013, written due to both diesel generators (DGs) being simultaneously inoperable. There is no action statement in the Palisades TS for both DGs being inoperable, so, even though the condition existed for only about five minutes, "a condition prohibited by plant technical specifications" existed. STS contain a 2 hour allowed action time for such an event. Conversion to STS will delete the required cross train testing and provide an action statement for the condition where both DGs are momentarily inoperable. The LER states: "A corrective action for this event is to submit a revision to the electrical section of the Palisades Technical Specifications. One of the changes that will be included is a revision to the action statements regarding diesel generator operability which emulates NUREG 1432, 'Standard Technical Specifications for CE Plants,' Section 3.8.1."</p>
5	08/12/94 02/25/94	<p>In our 8/12/94 letter updating our EDSFI commitment to revise the electrical section of our technical specifications, we stated, in part: "On February 25, 1994, Consumers Power Company notified the NRC of our intent to submit a Technical Specification change request (TSCR) which would resolve EDSFI concerns number 21 (lack of evidence of EDG fuel consumption rate and duration of day tank fuel supply) and 50 (outdated TS requirement for 16,000 gallons of stored fuel oil). . . . In order to avoid duplication of effort, the electrical section TSCR resolving EDSFI concerns 21 and 50 will be made as part of our initial Standard Technical Specification submittal currently planned for early in the fall of 1994."</p>
6	01/24/89	<p>During 1984, Palisades installed a new Control Room Ventilation system, in response to GL 83-37 and Item II.D.3.4 of NUREG 0737. On 11/19/84 Palisades submitted a TS change request containing operating limits associated with the new system. On 01/24/89, CPCo requested withdrawal of that TS change, along with several others. The withdrawal request included a commitment to make necessary changes in the proposed TS and resubmit them as part of the Restructured TS.</p>
7	12/07/90 [03/28/90]	<p>Following an NRC audit of the upgraded Palisades Reactor Protective System, the NRC requested, on 03/28/90, that Palisades "propose a Technical Specification to ensure a control room temperature not greater than 90°F. Include a control room temperature limit in the RSTS to assure operability of the RPS Thermal Margin Monitor circuitry." In our 12/07/90 answer to the NRC request, we stated "we will evaluate the NRC request as part of our Restructured Technical Specifications program." Conversion to STS will result in a control room temperature Technical Specification limit of 90°F. Appropriate limits will be included as part of the conversion to STS.</p>

Item	Letters [NRC LTR]	COMMITTED ACTION
8	01/24/89	On 11/24/80, CPCo submitted a TS change request for the containment spray system. That change request was intended to assure faster initiation of containment spray by requiring that the spray headers remain filled to at least the 735' elevation during operation. The change request was withdrawn on 01/24/89, along with several others. The withdrawal request contained a commitment to factor the changes into the Restructured Technical Specifications.
9	[04/21/89 IR 89-09] 03/23/89 LER 84-22R2 [09/21/87 IR 87-22] 12/05/84 LER 84-22R1 11/21/84 LER 84-22	Palisades Technical Specifications do not contain a limitation on Containment Air Temperature. On one occasion, the containment air temperature was found to be higher, during operation, than had been assumed in the Main Steam Line Break Analysis. Suitable limitations were imposed, and a commitment was made to include an appropriate LCO in the Restructured Technical Specifications.
10	05/01/91 06/28/89 [10/17/88 GL 88-17]	The CPCo response to GL 88-17 committed to resolve the conflict between the GL 88-17 requirement for having a HPSI pump available at low temperatures with the Appendix G analysis requirement to assure both HPSI pumps are incapable of injection into the PCS at those temperatures. The necessary Technical Specifications and TS Bases explanations will be included in the proposed Palisades standardized TS.
11	[04/22/88 IR 88-08] [07/17/80 IR 80-10]	<p>During routine inspections in 1980 and 1988, NRC inspectors noted that the Boric Acid system TS did not require sufficient operable equipment to meet the single failure criterion, despite credit being taken for boric acid injection in the analysis for a main steam line break. Plant operating requirements require additional equipment, assuring that a single failure would not disable the system. At the time of the 1988 inspection, CPCo made verbal commitments to submit appropriate TS. The main steam line break event was reanalyzed when new steam generators were installed. The current analyses of record, for steam line break or other events, do not take credit for injection of boric acid. Therefore, the boric acid system, at Palisades would no longer meet the NRC criterion for inclusion in the TS and a TS change is not necessary to assure meeting the single failure criterion.</p> <p>The CE STS, NUREG 1432, do not contain limits for boric acid system components. Conversion to STS will relocate boric acid system limits from the Palisades TS to documents controlled under 10 CFR 50.59.</p>
12	05/28/86 12/01/82	<p>On 11/12/81, CPCo submitted a TS change request involving leak testing of systems outside the containment which could contain highly radioactive fluids. On 12/01/82 in the letter which issued TS Amendment 71, the NRC requested that CPCo propose revisions to that change request for TS sections 4.5.3 and 6.15 to consolidate the testing requirements and reduce the likelihood of confusion or conflict. On 05/28/86, CPCo requested withdrawal of several TS change requests, the 11/12/81 change request among them. In the 05/28/86 response to that withdrawal request, the NRC stated that there was still a possible conflict and that they "would expect you to resubmit this [11/12/81] application, taking into account the comments in our December 1, 1992 letter."</p> <p>The possible confusion and conflict between the subject TS still exists. Conversion to STS will revise both affected sections of the TS and avoid this potential problem.</p>
13	09/24/87 LER 87-28 08/12/87 LER 87-22 07/20/87 LER 87-18 08/27/84 LER 84-14	Palisades TS contain a limit on primary coolant system temperature for critical operation; they do not contain an associated action statement. On at least four occasions, PCS temperature has momentarily dropped below this limit due to feedwater or steam flow perturbations. Each such occurrence is reportable as a condition prohibited by TS. Conversion to STS will retain a LCO on PCS temperature, but will provide an appropriate action statement.