

ENCLOSURE 1

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

**CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS
ADDITIONAL REVISION - ITS SECTION 3.1**

**RESPONSE TO NRC REQUEST
SECTION 3.1, REACTIVITY CONTROL SYSTEMS**

9904150062 990407
PDR ADOCK 05000255
P PDR

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. One full-length control rod immovable, but trippable.</p>	<p>D.1 Restore control rod to OPERABLE status.</p>	<p>Prior to entering MODE 2 following next MODE 3 entry</p>
<p>E. Required Action and associated Completion Time not met.</p> <p><u>OR</u></p> <p>One or more control rods inoperable for reasons other than Condition D.</p> <p><u>OR</u></p> <p>Two or more control rods misaligned by > 8 inches.</p> <p><u>OR</u></p> <p>Both rod position indication channels inoperable for one or more control rods.</p>	<p>E.1 Be in MODE 3.</p>	<p>6 hours</p>

BASES

ACTIONS
(continued)

D.1

Condition D is entered whenever it is discovered that a single full-length control rod can not be moved by its operator yet the control rod is still capable of being tripped. Although the ability to move a full-length control rod is not an initial assumption used in the safety analyses, it does relate to full-length control rod OPERABILITY. The inability to move a full-length control rod by its operator may be indicative of a systemic failure (other than trippability) which could potentially affect other rods. Thus, declaring a full-length control rod inoperable in this instance is conservative since it limits the number of full-length control rods which can not be moved by their operators to only one. The Completion Time to restore an inoperable control rod to OPERABLE status is stated as prior to entering MODE 2 following next MODE 3 entry. This Completion Time allows unrestricted operation in MODES 1 and 2 while conservatively preventing a reactor startup with an immovable full-length control rod.

E.1

If the Required Action or associated Completion Time of Condition A, Condition B, Condition C, or Condition D is not met; one or more control rods are inoperable for reasons other than Condition D; or two or more control rods are misaligned by > 8 inches, or two channels of control rod position indication are inoperable for one or more control rods, the plant is required to be brought to MODE 3. By being brought to MODE 3, the plant is brought outside its MODE of applicability. Continued operation is not allowed in the case of more than one control rod misaligned from any other rod in its group by > 8 inches, or two or more rods inoperable. This is because these cases may be indicative of a loss of SDM and power re-distribution, and a loss of safety function, respectively.

Also, if no rod position indication exists for one or more control rods, continued operation is not allowed because the safety analysis assumptions of rod position cannot be ensured.