

A CMS Energy Company

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

Tel: 616 764 2276
Fax: 616 764 2490

Nathan L. Haskell
Director, Licensing

September 30, 1999

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT - IMPROVED TECHNICAL SPECIFICATIONS - PROPOSED LICENSE CONDITION - SURVEILLANCE IMPLEMENTATION

NRC letter dated July 13, 1999 requested that Consumers Energy take the following four actions: (1) Provide comments on the ITS draft SE by July 30, 1999; (2) Provide certified ITS and Bases by August 6, 1999; (3) Specify a fixed date by which the ITS will be implemented; and, (4) Request a license condition for the first performance of new and revised surveillance requirements for the ITS to be related to the implementation of the ITS.

Action (1) was completed on July 30, 1999 and Action (2) was submitted on September 17, 1999. (Submittal of Action (2) was delayed, with the concurrence of the NRC Palisades Project Manager, until a final review item was resolved). This letter notifies the NRC that Consumers Energy will implement ITS at Palisades on or before October 31, 2000; and, in Attachments 1 and 2, contains a request for a license condition which relates the first performance of new or revised surveillance requirements to the implementation of ITS.

In addition to the information requested in the July 13, 1999 NRC letter, this letter provides, in Attachment 3, the measured drift data for Engineered Safety Features instrumentation which was reviewed with the NRC staff during a conference call on August 18 1999; and, in Attachment 4, a summary of the September 8, 1999 telephone conference with the NRC staff in regard to the risk impact of the reorganization of the LCOs addressing equipment related to post accident containment cooling.

9910060179 990930
PDR ADOCK 05000255
P PDR

A0011/1

SUMMARY OF COMMITMENTS

This letter contains one new commitment and no revisions to existing commitments. That new commitment is:

Consumers Energy will implement ITS at Palisades on or before October 31, 2000.



Nathan L. Haskell
Director, Licensing

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

Attachments

CONSUMERS ENERGY COMPANY

FACILITY OPERATING LICENSE CHANGE REQUEST

To the best of my knowledge, the content of the attached request for a change to the Facility Operating License, which adds a condition providing guidance on implementation of new and revised surveillance requirements, is truthful and complete.

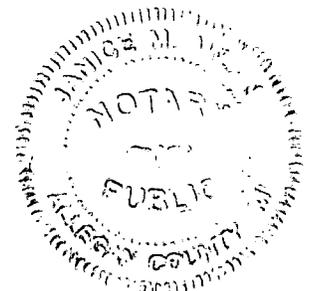
Nathan L. Haskell

Nathan L. Haskell
Director, Licensing

Sworn and subscribed, to before me this 30th day of September 1999.

Janice M. Milan

Janice M. Milan, Notary Public
Allegan County, Michigan
(Acting in Van Buren County, Michigan)
My commission expires September 6, 2003



ATTACHMENT 1

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

**IMPROVED TECHNICAL SPECIFICATIONS
PROPOSED LICENSE CONDITION
SURVEILLANCE IMPLEMENTATION**

FACILITY OPERATING LICENSE CHANGE REQUEST

CONSUMERS POWER COMPANY
Docket 50-255
FACILITY OPERATING LICENSE CHANGE REQUEST
License DPR-20

It is requested that the Facility Operating License DPR-20, Docket 50-255, for the Palisades Plant be changed as described below. This proposed license condition will implement the request, made in our January 26, 1998 letter, that "Consumers Energy intends to consider these new requirements as "met" at the time of implementation of the ITS, with the first performance to be completed within the required frequency from the implementation date."

I. The following Changes are Proposed:

It is proposed that paragraph 2.C of the Facility Operating License be revised as follows:

Paragraph 2.C states:

This license shall be deemed to contain and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

Paragraph 2.C currently contains three conditions, one limiting maximum steady-state core power level; one incorporating the Technical Specifications as Appendix A, and the Environmental Protection Plan as Appendix B; and one requiring implementation of the Fire Protection Program.

It is proposed that Paragraph 2.C be revised to add a fourth condition as follows:

- (4) Upon implementation of Amendment _____, the schedule for the performance of new and revised Surveillance Requirements (SRs) shall be as follows:
- a. For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
 - b. For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
 - c. For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
 - d. For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.

II. Discussion of Changes:

The proposed change would provide guidance on initial performance of new and revised Surveillance Requirements contained within the Palisades Improved Technical Specifications. The proposed condition would provide clarity in scheduling surveillance testing in the period immediately after implementation. The License Condition, in itself, does not alter any existing surveillance test intervals, or add or delete any surveillance requirements. All changes to existing Surveillance Requirements have been identified and justified within our amendment request for conversion to Improved Technical Specifications.

In addition to the addition of condition 2.C.(4), the license has been reformatted using the same type font as the Improved Technical Specifications (Arial 11) and the footnote has been deleted from page three. The text associated with that footnote has been moved to page 4, which contains the same footnote.

III. Analysis of No Significant Hazards Consideration

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

The proposed change to the Facility Operating License would provide guidance on initial performance of new and revised Surveillance Requirements contained within the Palisades Improved Technical Specifications. It would not alter the assumed initiators to any analyzed event. It would not initiate any new testing or change the operating practices for any plant systems. It would not alter the settings of any plant instruments or equipment. Therefore, since the proposed change would not alter the plant or its operating practices, the probability of an accident previously evaluated would not be increased by this proposed change.

Similarly, since the proposed change would not alter the plant or its operating practices, the proposed change would have no effect on any plant conditions or equipment availability assumed in the Palisades FSAR Chapter 14 accident analyses. The predicted consequences of these accidents would, therefore, be unaffected.

Therefore, operation of the facility in accordance with the proposed change to the Facility Operating License would not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change would provide guidance on initial performance of new and revised Surveillance Requirements contained within the Palisades Improved Technical Specifications. The change would not involve any alteration in the plant configuration (no new or different type of equipment will be installed) or make changes in equipment settings or the methods governing normal plant operation.

Therefore, operation of the facility in accordance with the proposed change to the Facility Operating License would not create the possibility of a new or different kind of accident from any previously evaluated.

c. Involve a significant reduction in a margin of safety.

The proposed change would provide guidance on initial performance of new and revised Surveillance Requirements contained within the Palisades Improved Technical Specifications. The change would not involve any alteration in the plant configuration (no new or different type of equipment will be installed) or make changes in equipment settings or the methods governing normal plant operation.

Therefore, operation of the facility in accordance with the proposed change to the Facility Operating License would not involve a significant reduction in the margin of safety.

III. Conclusion

The Palisades Plant Review Committee has reviewed this request for a change to the Facility Operating License 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.