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U S Nuclear Regulatory Commission  
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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT**  
**TECHNICAL SPECIFICATIONS CHANGE REQUEST - DELETION OF SNUBBER REQUIREMENTS**

A request for a change to the Palisades Technical Specifications and a request for relief from certain testing requirements of the ASME Boiler and Pressure Vessel Code are enclosed. Enclosure 1 to this letter contains the Technical Specifications Change Request; Enclosure 2 contains the relief request.

The Technical Specification change is requested to delete snubber operability requirements currently in LCO 3.20 and snubber testing requirements currently in Surveillance Requirement 4.16. The proposed change would not eliminate the requirement for snubbers to be operable, because snubbers are considered to be "necessary attendant auxiliary equipment" as defined in the OPERABILITY definition of Technical Specifications, Section 1.0. Therefore, in order for required systems to be considered Operable, snubbers must be "capable of performing their related support function." Similarly, the proposed change would not eliminate the requirement for snubber testing. Snubber testing would continue to be required under 10 CFR 50.55a and Technical Specification 6.5.7, Inservice Inspection and Testing Program, as part of ASME Boiler and Pressure Vessel Code, Section XI, testing. Snubber operability is not explicitly addressed in the Standard Technical Specifications (NUREG 1432).

As discussed in the enclosed Technical Specifications change request, this change would result in slightly different testing requirements due to the differences between the requirements of current Technical Specifications and those of the ASME code. It is estimated that 3 to 4 days of testing time, a direct cost savings of several thousand dollars, and a small reduction in radiological dose would be saved each refueling outage. There are no unique features of the Palisades design which necessitate the differences between the testing requirements in the Technical Specifications and those in the ASME code.

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Palisades is in the process of preparing a change request to convert to Standard Technical Specifications (STS). Since snubber operability and testing requirements are not explicitly addressed in STS, that change will accomplish the deletion of the subject requirements. The conversion to STS will not be accomplished, however, prior to the upcoming outage.

The relief request would revise the relief approved on June 28, 1996, to allow performance of the ISI program snubber inservice visual inspections in accordance with the recommendations of Generic Letter 90-09 (GL 90-09), instead of the currently approved use of the requirements of TS 4.16.1.

The technical content of the relief request in Enclosure 2 was previously approved by the NRC on June 28, 1996. However, the granted approval was to perform visual inspections in accordance with TS 4.16.1. Although GL 90-09 and TS 4.16.1 contain the identical requirements for visual inspections and visual inspection intervals, GL 90-09 was not referenced. Since removal of TS snubber inspection and testing requirements is being requested, it is necessary to obtain explicit approval to inspect using the intervals stated in GL 90-09 in conjunction with the Technical Specification amendment.

Since this Technical Specifications change and associated Code relief will result in significant time and cost savings, it is requested that the NRC reviews be scheduled so that approval may be accomplished to support the April 25, 1998, scheduled "early start" date for our next refueling outage. To allow time for program development and implementing procedure revision prior to our outage "early start" date, we request NRC review by January 31, 1998. It is also requested that the associated license amendment be effective upon approval.

#### SUMMARY OF COMMITMENTS

This letter establishes no new commitments and makes no revisions to existing commitments.



Thomas C. Bordine  
Licensing Manager

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

Enclosures

**ENCLOSURE 1**

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

**TECHNICAL SPECIFICATIONS CHANGE REQUEST  
DELETION OF SNUBBER REQUIREMENTS**

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

It is requested that the Technical Specifications contained in the Facility Operating License DPR-20, Docket 50-255, for the Palisades Plant be changed as described below.

The following abbreviations are used in this change request:

AOT	Allowed Outage Time
Code	ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition
GL	Generic Letter
LCO	Limiting Condition for Operation
STS	Standard Technical Specifications (NUREG 1432)
TS	Current Palisades Technical Specifications
OMa-1988	ASME/ANSI OM-1987 (1988 addenda)

Attachment 1 to this change request contains the proposed TS and Bases pages. The changed areas are marked with a vertical line in the margin. Attachment 2 contains the current TS and Bases pages marked to show the proposed changes. These pages show a line drawn through proposed deletions and shading for proposed additions.

Attachment 3 to this change request contains a table which compares the requirements of TS 4.16 with those of the Code. Attachment 4 contains the current TS Snubber testing requirements marked to show the nearest equivalent testing requirement of the Code.

The proposed changes are described below. Each change is classified as one of the following categories:

ADMINISTRATIVE - A change which is editorial in nature, which only involves movement of requirements within the TS without affecting their technical content, or clarifies existing TS requirements. These changes are discussed generically in the No Significant Hazards Determination.

MORE RESTRICTIVE - A change which only adds new requirements, or which revised an existing requirement resulting in additional operational restriction. These changes are discussed generically in the No Significant Hazards Determination.

LESS RESTRICTIVE - A change which deletes any existing requirement, or which revises any existing requirement resulting in less operational restriction. These changes are described individually in the No Significant Hazards Determination.

I. The following Changes are Proposed:

TS 3.20, "Shock Suppressors (Snubbers)", and the associated Surveillance Requirement, TS 4.16 "Inservice Inspection Program for Shock Suppressors (Snubbers)," have been deleted. TS pages 3-79b and 4-70 have been revised to show the deletion of page 3-80 and pages 4-71 through 4-71a. TS 3.20 is comprised of two requirements, LCO 3.20.1 and Action 3.20.1a. The effects of deleting each of these requirements, and the requirements of TS 4.16 are discussed separately.

- A. LCO 3.20.1, on page 3-80, has been deleted. LCO 3.20.1 states:

*When systems associated with snubbers in Specification 3.20 are required to be OPERABLE, the snubbers in those systems shall be OPERABLE except as noted below:*

Deletion of this explicit LCO for snubber operability will not remove the necessity for the snubber to be operable. Those snubbers in systems which are required to be operable would still be the subject of TS operability requirements because they are included in the TS definition of operability. In order for required systems, to be considered Operable (as defined in Section 1.0 of TS), required snubbers must be "capable of performing their related support function" since they are "necessary attendant auxiliary equipment." Therefore, despite deletion of the explicit snubber LCO, snubbers installed in systems required to be operable by TS would themselves be required to be operable. This proposed treatment of snubber operability requirements is the same as that in STS.

Since snubber operability would still be required for system operability, Change A does not alter any TS requirements and is therefore classified as Administrative.

- B. Required Action 3.20.1a, page 3-80, has also been deleted. Action 3.20.1a states:

*With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubbers to OPERABLE status and perform an engineering evaluation per Specification 4.16.1.c. on the supported component or declare the system inoperable.*

TS Action 3.20.1 provides a 72 hour AOT in which to replace an inoperable snubber, to restore it to operable status, or to declare the supported system inoperable. Snubbers are considered to be "necessary attendant auxiliary equipment." Therefore, in order for a system to be considered Operable, the associated required snubbers must be "capable of performing their related support function." Deletion of Action 3.20.1a will require that a supported system be declared to be inoperable immediately upon discovery that a required snubber is inoperable. Plant operation would then be limited by the Actions in the LCO for the supported system. This proposed treatment of inoperable snubbers is the same as that in STS.

Change B represents a reduction in the time allowed for continued operation when a required snubber becomes inoperable. Therefore, Change B is classified as More Restrictive.

- C. TS 4.16, Inservice Inspection Program for Shock Suppressors (Snubbers), has been deleted with reliance placed upon the testing requirements of the Code. (Deletion of TS 4.16.1f is discussed separately, as Change D, below.) TS Page 4-70 has been revised to show the deletion of pages 4-71 through 4-74a.

TS 6.5.7, Inservice Inspection and Testing Program, provides controls for inservice inspection and testing of ASME Code Class 1, 2, and 3 components. Deletion of TS 4.16 will result in the Palisades snubber testing being controlled by the requirements of the Code. There are no unique features of the Palisades design which would make the Code testing requirements inadequate to assure snubber operability is being monitored and maintained.

Attachments 3 and 4 to this change request contain detailed information on each change to the required snubber testing requirements caused by the deletion of TS 4.16. In general, the effects would be:

1. The change would allow the number of steam generator snubbers tested each refueling outage to be reduced from 25% of the total population to 10%. There are sixteen steam generator snubbers installed at Palisades, therefore, the number of snubbers tested each refueling outage would be reduced from 4 to 2. The reduction in the number of steam generator snubbers tested each outage would result in a cost savings of approximately \$10,000 per outage, a reduction in radiological dose of about 50 mrem, and a 3 to 4 day reduction in testing.
2. The change would result in expanding the number of snubbers tested to include an additional snubber if any steam generator snubber failed the test. Currently, with 4 snubbers tested each outage, two snubbers failures must occur before the test scope must be expanded.
3. The change would remove the requirement that snubbers which exhibit testing failures must be retested during the following outage. However problems encountered would still be addressed and corrected (snubber repaired, modified, or replaced as necessary), and the number of snubbers tested expanded as necessary. This reduction in testing could save several thousand dollars and hundreds of mrem, depending on the location of the failed snubber.

As discussed above, Change C would involve a reduction in required snubber testing. Change C is classified as Less Restrictive.

- D. The change would delete the TS 4.16.1f requirement for service life monitoring, but add an identical requirement to the Operating Requirements Manual (ORM), since the Code has no similar requirements. Revision 19 to the Palisades FSAR revised Section 12.3.3 to incorporate the ORM into the FSAR by reference. ORM revisions are controlled under the provisions of 10 CFR 50.59.

Change D deletes a TS requirement, but adds an identical requirement to a document (the ORM) controlled under 10 CFR 50.59. Change D is classified as Less Restrictive.

## II. Analysis of No Significant Hazards Consideration

Consumers Power Company finds that this proposed TS change involves no significant hazards and accordingly, a no significant hazards determination in accordance with 10 CFR 50.92(c) is justified.

### Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

#### 1. Administrative Change (Change A):

"Administrative" changes make wording changes which clarify existing TS requirements, without affecting their technical content. Since "Administrative" changes do not alter the technical content of any requirements, they cannot involve a significant increase in the probability or consequences of an accident previously evaluated.

#### 2. More Restrictive Change (Change B):

"More Restrictive" changes only add new requirements, or revise existing requirements to result in additional operational restrictions. The TS, with all "More Restrictive" changes incorporated, will still contain all of the requirements which existed prior to the changes. Therefore, "More Restrictive" changes cannot involve a significant increase in the probability or consequences of an accident previously evaluated.

#### 3. Less Restrictive Change (Change C):

Proposed Change C deletes the explicit snubber testing requirements from the Palisades TS, placing reliance for periodic snubber inspection and testing on the requirements of the Code. While there are differences in the testing requirements contained in the current TS and in the Code, there are no unique features of the Palisades snubber installations which would make the Code requirements inadequate for assuring operability of the snubbers on required systems. Removal of snubber record retention requirements would have no effect on plant snubbers or the related equipment. This change cannot significantly increase the probability of an accident because the functioning or failure to function of a snubber is not, itself, an initiator and does not affect the items which are initiators of any analyzed accident.

The use of an alternate set of approved snubber inspection and testing requirements and the removal of snubber record keeping requirements from TS will have no significant effect on the failure probability of installed snubbers, or on the probability of a snubber failure going unnoticed. Since the probability of a snubber failure, or of operating with an undiscovered snubber failure is not significantly altered, the proposed change would not significantly increase the probability of additional piping failure during an accident and the resultant consequences of an accident.

Therefore, operation of the Facility in accordance with proposed Change C would not involve a significant increase in the probability or consequences of an accident previously evaluated.

#### 4. Less Restrictive Change (Change D):

Change D deletes a TS requirement, but adds an identical requirement to a document (the ORM) controlled under 10 CFR 50.59.

10 CFR 50.59 specifically prohibits changes to the facility as described in the safety analysis report, and to procedures described in the safety analysis report "if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased". Since the conditions which limit changes performed under 50.59 are more restrictive than the conditions which define changes considered to involve a significant hazards consideration, moving of a requirement from the TS to a document which is controlled under 50.59 cannot involve a significant increase in the probability or consequences of an accident previously evaluated.

Do the proposed changes create the possibility of a new or different kind of accident from any previously evaluated?

#### 1. Administrative Change (Change A):

"Administrative" changes make wording changes which clarify existing TS requirements, without affecting their technical content. Since "Administrative" changes do not alter the technical content of any requirements, they cannot create the possibility of a new or different kind of accident from any previously evaluated.

#### 2. More Restrictive Change (Change B):

"More Restrictive" changes only add new requirements, or revise existing requirements to result in additional operational restrictions. The TS, with all "More Restrictive" changes incorporated, will still contain all of the requirements which existed prior to the changes. Therefore, "More Restrictive" changes cannot create the possibility of a new or different kind of accident from any previously evaluated.

#### 3. Less Restrictive Change (Change C):

Proposed Change C deletes the explicit snubber testing requirements from the Palisades TS, placing reliance for periodic snubber inspection and testing on the requirements of the Code. Snubbers are intended to support and restrain piping from excessive motion due to seismic and post accident loading. The use of an alternate set of approved snubber inspection and testing requirements will have no significant effect on the failure probability of installed snubbers, or on the probability of a snubber failure going unnoticed. The accident analyses currently evaluate the effects of failure of safety related, high energy piping. Removal of snubber record retention requirements would have no effect on plant snubbers or the related equipment. Since snubber failure, or operation with an undetected failed snubber, could, at worst, contribute to the failure of piping during a seismic event, and since that event has



been previously evaluated, operation of the Facility in accordance with the proposed TS change would not create the possibility of a new or different kind of accident from any previously evaluated.

4. Less Restrictive Change (Change D):

Change D deletes a TS requirement, but adds an identical requirement to a document (the ORM) controlled under 10 CFR 50.59.

10 CFR 50.59 specifically prohibits changes to the facility as described in the safety analysis report, and to procedures described in the safety analysis report "if a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created". Since the conditions which limit changes performed under 50.59 are more restrictive than the conditions which define changes considered to involve a significant hazards consideration, relocation of a requirement from the TS to a document which is controlled under 50.59 cannot create the possibility of a new or different kind of accident from any previously evaluated.

Do the proposed changes involve a significant reduction in a margin of safety?

1. Administrative Change (Changes A):

"Administrative" changes make wording changes which clarify existing TS requirements, without affecting their technical content. Since "Administrative" changes do not alter the technical content of any requirements, they cannot involve a significant reduction in a margin of safety.

2. More Restrictive Change (Change B):

"More Restrictive" changes only add new requirements, or revise existing requirements to result in additional operational restrictions. The TS, with all "More Restrictive" changes incorporated, will still contain all of the requirements which existed prior to the changes. Therefore, "More Restrictive" changes cannot involve a significant reduction in a margin of safety.

3. Less Restrictive Change (Change C):

Proposed Change C deletes the explicit snubber testing requirements from the Palisades TS, placing reliance for periodic snubber inspection and testing on the requirements of the Code. While there are differences in the testing requirements contained in the current TS and in the Code, there are no unique features of the Palisades snubber installations which would make the Code requirements inappropriate for assuring operability of the snubbers on required systems. The use of an alternate set of approved snubber inspection and testing requirements will, therefore, have no significant effect on the failure probability of installed snubbers, or on the probability of a snubber failure going unnoticed. Removal of snubber record retention requirements would have no effect on

plant snubbers or the related equipment. Since the probability of a snubber failure, or of operating with an undiscovered snubber failure is not significantly altered, and since the change in snubber testing does not affect any of the operating plant systems, operation of the Facility in accordance with the proposed TS change would not involve a significant reduction in a margin of safety.

#### 4. Less Restrictive Change (Change D):

Change D deletes a TS requirement, but adds an identical requirement to a document (the ORM) controlled under 10 CFR 50.59.

10 CFR 50.59 specifically prohibits changes to the facility as described in the safety analysis report, and to procedures described in the safety analysis report "if the margin of safety as defined in the basis for any technical specification is reduced". Since the conditions which limit changes performed under 50.59 are more restrictive than the conditions which define changes considered to involve a significant hazards consideration, relocation of a requirement from the TS to a document which is controlled under 50.59 cannot involve a significant reduction in a margin of safety.

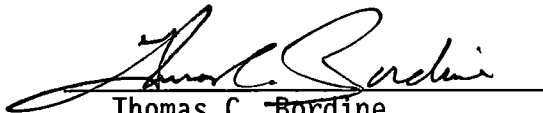
### III. Conclusion

The Palisades Plant Review Committee has reviewed this TS 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 ENERGY COMPANY

TECHNICAL SPECIFICATIONS CHANGE REQUEST

To the best of my knowledge, the content of this Technical Specifications change request, which deletes the explicit Technical Specifications requirements for snubber operability and testing, is truthful and complete.



Thomas C. Bordine  
Manager, Licensing

Sworn and subscribed to before me this 3<sup>rd</sup> day of September 1997.



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