



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 59 TO PROVISIONAL OPERATING LICENSE NO. DPR-20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated May 14, 1980, Consumers Power Company (CPC) (the licensee) requested a change to the Technical Specifications for the Palisades plant which would delete the requirement to verify, on a quarterly basis, the operation of valves associated with the Safety Injection and Refueling Water Storage Tank Level Interlocks.

2.0 BACKGROUND

By letter dated February 21, 1979, CPC submitted for approval a proposed Inservice Testing Program which would periodically test safety-related valves. The valves that are the subject of this request are included in this Inservice Testing Program.

By letter dated December 7, 1977, the Commission directed the licensee to comply with provisions of both his Technical Specifications and his proposed Inservice Inspection (ISI) and Inservice Testing (IST) Programs until such time as his ISI and IST programs were approved. In addition, our letter of December 7, 1977, granted interim relief for testing which would result in hardships or unusual difficulties, or which would conflict with existing Technical Specification requirements.

3.0 DISCUSSION

When the water in the Safety Injection and Refueling Water (SIRW) tank reaches a predetermined low level, the recirculation actuation signal (RAS) is initiated. The RAS opens the containment sump valves, closes the SIRW tank valves, stops the low-pressure pumps and closes the valves in the pump minimum flow lines. The valves are arranged to insure at least a one-minute over-lapping stroke to allow mixing and assure adequate NPSH during the transfer. If cool water is available from the spray pumps and shutdown cooling heat exchangers, a portion of the water discharged from the shutdown cooling heat exchangers may be manually diverted to the high-pressure pump suction. This is a preferred mode of operation,

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but is not necessary to meet core cooling requirements. The low-pressure pumps may be manually restarted to obtain increased cooling flow when the primary coolant system pressure is reduced. One or more spray pumps can also be used to augment flow to the core after the pressure is reduced.

The following valves are actuated by the RAS:

<u>Valve Number</u>	<u>Function</u>	<u>Final Position</u>
CV-0823	Service Water Discharge from Component Cooling Heat Exchanger	Fully Open
CV-0826		Fully Open
CV-0945	Component Cooling Water Inlet to Component Cooling Heat Exchanger	Fully Open
CV-0946		Fully Open
CV-3030	(Containment Sump Valves)	Open
CV-3029		Open
CV-3031	SIRW Tank Outlet Valves	Shut
CV-3057		Shut
CV-3027	SIRW Tank Minimum Recirculation Valves	Shut
CV-3056		Shut

Item 12.b of Table 4.1.2 of the Technical Specifications currently requires the use of the SIRW tank and containment sump control switches to verify stroking of the above valves. However, Section 3.3 of the Palisades Plant Technical Specifications does not permit more than one high pressure safety injection pump or one low pressure safety injection pump to be inoperable at any time while the reactor is not in cold shutdown. If the SAS were to be used to test the operability of the valves associated with it, then shutting CV-3031 or CV-3057 would result in a violation of the Technical Specifications because shutting either of these valves would eliminate a source of water to more than one high pressure or low pressure safety injection pump.

4.0 EVALUATION

As a result of discussions concerning implementation of the Inservice Testing Program for valves, the NRC staff has determined that relief should be granted for the testing of certain valves if the failure of the valve in a non-conservative position during the test would reduce the capability of the system to perform its intended function in the event of an accident. In the case of valves CV-3031 and CV-3057, their failure in the closed position during a test would clearly reduce the capability of the safety injection system. We, therefore, conclude that these valves should not be stroked quarterly during normal plant operation as required by the existing Technical Specifications, but should be tested during

every cold shutdown, if they have not been tested within the past three months. Furthermore, since all valves which would be required to be stroked by the existing Technical Specifications are part of the licensee's proposed IST program, which has already been implemented, this Technical Specification requirement is superfluous. We therefore, conclude that deletion of item 12.b of Table 4.1.2 is acceptable and is consistent with current licensing requirements.

5.0 ENVIRONMENTAL CONSIDERATIONS

We have determined that this amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that this amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

We have concluded: (1) because the amendment does not involve a significant increase in the probability of consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: July 29, 1980