



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 121 TO PROVISIONAL OPERATING LICENSE NO. DPR-20  
CONSUMERS POWER COMPANY  
PALISADES PLANT  
DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated July 30, 1985, and supplemented by letter dated January 13, 1986, Consumers Power Company (the licensee) requested a deletion of the operability requirement for the high pressure safety injection (HPSI) flow instruments. Specifically, Table 3.17.4, Item No. 3 "high-pressure safety injection (HPSI) flow instruments" would be deleted from the table.

2.0 EVALUATION

HPSI flow instruments monitor flow rate in each of the four injecting lines to each of the reactor coolant loops and provides no control or safety actuation functions. The operability of the flow instruments has no effect on the operability of the HPSI system and, therefore, are not needed to mitigate the consequences of any of the design basis accidents analyzed in the FSAR. However, these flow instruments are part of the instrumentation used to follow the course of an accident as required by Regulatory Guide 1.97. The licensee has submitted an acceptable response to Generic Letter 82-33 relating to the requirements of Regulatory Guide 1.97 as discussed in our letter to the licensee dated July 19, 1988.

The proposed change will in no way violate the guidelines of the Standard Review Plan with respect to requirements of systems or component operability. HPSI flow instruments are not included in the guidance of standard technical specifications (STS) as identified in Chapter 16 of the Standard Review Plan. Consequently, the instruments are not required to be included in the TS of the Combustion Engineering Plants. However, the staff does expect the adoption of an administrative control program addressing the operable status of the HPSI flow instruments as reflected by the guidelines of the STS. By letter dated January 13, 1986, the licensee responded to our concern by describing the existence of a control program at the Palisades Plant that includes the flow instruments in question. The response describes the control program as covering preventative maintenance, periodic surveillance, backup instrumentation and the return of inoperable instruments to operable status. We find the licensee's control program as an adequate means of assuring instrument operability during a potential accident condition.

Based on the above evaluation, the staff finds the deletion of HPSI flow instruments from Table 3.17.4 and the TS acceptable.

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### 3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and a change to the surveillance requirements and Administrative Controls. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(7) and (9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: May 12, 1989

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