

Consumers Energy

A CMS Energy Company

Palisades Nuclear Plant
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Director, Licensing

November 2, 1999

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
TECHNICAL SPECIFICATIONS CHANGE REQUEST
COLR REFERENCES AND Pa - SUPPLEMENTAL INFORMATION**

On October 28, 1999, Consumers Energy Company requested a change to the Palisades Technical Specifications (TS), and stated that approval of the change was needed by 16 November 1999 in order to avoid a delay in the startup from the in-progress refueling outage, but did not establish that the need for the requested action could not reasonably have been identified sooner. This letter explains the circumstances that led to the need for a change not being identified sooner.


The October 28, 1999 change request identifies two necessary changes: 1) the peak calculated containment internal pressure, P_c , listed in Section 6.5.14, Containment Leak Rate Testing Program, and 2) the list of methodology documents in Section 6.6.5, Core Operating Limits Report.

The need for a change to P_c was identified on or about 21 October 1999, upon completion of the re-analysis of the containment response to a Large Break Loss Of Coolant Accident. The need for that re-analysis was driven, in part, by a change in the coatings used on some internal containment surfaces during the current refueling outage. The coating formerly used is no longer manufactured. The re-analysis could not be performed sooner because certain physical parameters of the new coating material were not available sooner.

The need for a change to the list of methodology documents was not identified sooner because a list of approved methodology documents currently appears in both the TS and the COLR. The personnel maintaining the COLR did not realize that the documents were also listed in the TS; the personnel maintaining the TS were unaware that the COLR list of documents had been revised. The discrepancy was noted on 21 October 1999, and preparation of the TS change request initiated on the same day. As a possible corrective action to prevent re-occurrence, we are considering removing the list of documents from the COLR, and instead, referencing the list in the TS. A copy of this letter has been sent to the appropriate official of the State of Michigan.

SUMMARY OF COMMITMENTS

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

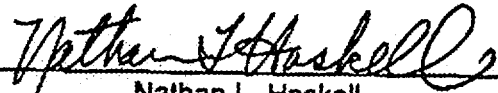

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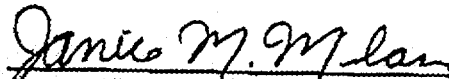
CC: Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades
Dennis R. Hahn, Michigan Department of Environmental Quality

CONSUMERS ENERGY COMPANY
TECHNICAL SPECIFICATIONS CHANGE REQUEST

To the best of my knowledge, the content of this letter providing supplemental information on our October 28, 1999 Technical Specifications change request which revises 1) the list of methodology documents in Section 6.6.5 and 2) the peak calculated containment internal pressure, P_a, listed in Section 6.5.14, is truthful and complete.


Nathan L. Haskell
Director, Licensing

Sworn and subscribed to before me this 2nd day of November 1999


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