

February 16, 2000

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

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
REQUEST FOR ENFORCEMENT DISCRETION - Surveillance Requirement for Auxiliary Feedwater Pump P-8B

It is requested that a Notice of Enforcement Discretion be issued to allow plant startup and subsequent operation without compliance with Surveillance requirements (and implied operability requirement) of the Technical Specifications (TS) 4.9a.2. for the manual backup steam supply for steam turbine driven Auxiliary Feedwater Pump P-8B. All other testing and operability requirements for Pump P-8B will be met. This action is requested for a limited period of time to permit plant startup from the current maintenance outage and subsequent plant operation while a Technical Specification change request is processed. The manual backup steam supply for Auxiliary Feedwater Pump P-8B is not necessary for any required safety function.

On February 5, 2000, a steam leak developed in the underground piping which provides a manual backup steam supply to Auxiliary Feedwater Pump P-8B. This manual backup steam supply line provides no required safety function, but it does provide an alternative steam supply to P-8B for operational flexibility. This line is routed underground beneath the floor of the Turbine Building. The area immediately surrounding the leak has been excavated and the pipe section containing the leak has been cut out and replaced. However, since the apparent cause of the leak is corrosion originating from the exterior of the pipe, the integrity of the remainder of the line, which has not been completely inspected, cannot be quantitatively proven. Due to the inability to easily demonstrate complete code compliance for the entire length of underground pipe, the decision was made on February 13, 2000, to consider this manual backup steam supply line inoperable.

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Both complete replacement of the underground pipe, and rerouting the steam supply through the turbine building have been considered. First estimates indicate that either of these repair methods would cost in excess of one million dollars, and either would take longer than six weeks to design, fabricate and install. Because such a replacement has been judged to have no significant safety benefit, the expense of repair cannot be justified on the basis of maintaining operational flexibility.

Auxiliary Feedwater Pump P-8B is required to be operable by LCO 3.5.1.a, which states, in part, *"The steam driven pump shall be operable prior to making the reactor critical."* The associated Surveillance Requirement, 4.9a.2, is a monthly test which specifies *"The OPERABILITY of the steam-driven pump shall be verified by starting alternately from each control room switch and from the pump test-key switch in a three month period."* The phrase "each control room switch" refers to the switches on the main control board that operate the steam supply valves, CV-0522B and CV-0522A, for the normal (automatically actuated) and backup (manually actuated) supplies to the P-8B turbine. There is no other reference to the manual backup steam supply for P-8B in the TS.

The existence of this surveillance requirement, which specifically requires testing of the manual backup steam supply valve, implies that this manual backup steam supply line is a required feature to support operability of P-8B. Considering the manual backup steam supply line inoperable, therefore, implies that P-8B is inoperable because it lacks a required feature necessary to support its operability. The normal steam supply to Pump P-8B has both automatic and manual actuation capabilities. In addition, the two electrically driven Auxiliary Feedwater pumps, which are both safety related, have both automatic and manual actuation capabilities. The manual backup steam supply line is not required for the P-8B function in any plant Design Basis Event. A Probabilistic Safety Analysis, comparing plant operation with and without the manual backup steam supply available, has shown there to be no significant change in risk. The manual backup steam supply does not meet any of the 10 CFR 50.36 criteria for inclusion in TS. A TS change request, for both the current TS and the Improved TS, is being prepared to remove the requirements associated with the manual backup steam supply for pump P-8B. That TS change request will be submitted within 48 hours after approval of the requested Notice of Enforcement Discretion.


Attachment 1, therefore, requests Enforcement Discretion to permit plant startup and subsequent operation until a TS change request can be processed. That change request will revise Surveillance Requirement 4.9a.2 to clearly specify that it applies to the switch for the primary steam supply valve CV-0522B and the pump test-key switch on the automatic Auxiliary Feedwater Actuation System, but not to the switch for the manual backup steam supply valve. Discretion is requested under Inspection Manual Part 9900, Notices of Enforcement Discretion, Criterion B.3.a, "The equipment or system does not perform a safety function in the mode in which operation is to occur (e.g., a TS which requires the equipment to be operable in a mode not required by the UFSAR)." The request for Enforcement Discretion also meets Criterion B.3.c which states in part, "The TS or other license conditions require a test, inspection or system realignment that is inappropriate for the particular plant conditions, in that it does not provide a safety benefit..." Enforcement

Discretion is requested only for the period of time necessary to process a Technical Specification Change.

The plant is currently heating up in preparation for taking the reactor critical on Wednesday, February 16, 2000. Auxiliary Feedwater Pump P-8B is required to be operable prior to bringing the reactor critical. It is, therefore, requested that NRC give this issue prompt consideration.

SUMMARY OF COMMITMENTS

This letter contains a commitment to submit a TS change, for both the current TS and the Improved TS, to remove the requirements associated with the manual backup steam supply for pump P-8B. That TS change request will be submitted within 48 hours after approval of the requested Notice of Enforcement Discretion.



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Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

Attachment

ATTACHMENT

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

**REQUEST FOR ENFORCEMENT DISCRETION
Surveillance Requirement for Auxiliary Feedwater Pump P-8B**

REQUEST FOR ENFORCEMENT DISCRETION
Surveillance Requirement for Auxiliary Feedwater Pump P-8B

It is requested that a Notice of Enforcement Discretion be issued to allow plant startup and subsequent operation without compliance with Surveillance requirements (and implied operability requirement) of the Technical Specifications (TS) 4.9a.2. for the manual backup steam supply for steam turbine driven Auxiliary Feedwater Pump P-8B. The following discussion is provided to address the required elements of a request for Enforcement Discretion as defined in Inspection Manual Part 9900, Notices of Enforcement Discretion.

1) REQUIREMENTS FOR WHICH ENFORCEMENT DISCRETION IS REQUESTED

Technical Specification (TS) 4.9a.2 specifies that for Auxiliary Feedwater Pump P-8B, at least once per 31 days, *"The operability of the steam-driven pump shall be verified by starting alternately from each control room switch and from the pump test-key switch in a three month period."*

The Basis for Technical Specification 4.9 states, *"The periodic testing of Section 4.9.a will verify auxiliary feedwater pump control circuits."*

2) DESCRIPTION OF NONCOMPLYING SITUATION AND REASON FOR URGENCY

On February 5, 2000, while operating steam turbine driven Auxiliary Feedwater Pump P-8B, a steam leak was observed. Auxiliary Feedwater Pump P-8B was placed in service using the manual backup (underground) steam supply (CV-0522A) and was put into service per normal system operating procedures to support the flushing and sodium concentration reduction efforts in steam generator E-50B. Electric motor driven auxiliary feedwater pump P-8C had been secured and P-8B was providing auxiliary feedwater flow to both steam generators. The P-8B Auxiliary Feedwater Pump had been running a little over half an hour at the time of discovery. The steam leak was observed to be coming from the 590' elevation floor in the northwest corner of the turbine building adjacent to drain cooler E-7A. A portion of the steam piping downstream of CV-0522A, which was in service, is buried five feet beneath the floor in this area.

This did not occur during an emergency demand event on the auxiliary feedwater system, but rather during a planned evolution. Prior to this, the plant had been shutdown by taking the turbine generator off line for a planned weekend outage. The motivation for the shutdown was to reduce the quantity of sodium and other impurities in the steam generators. The reactor had been tripped and the plant was in hot shutdown. Prior to this event, electric motor driven Auxiliary Feedwater Pump P-8C had been in service providing makeup to both steam generators. Following discovery, immediate action taken was to manually isolate steam flow to the P-8B turbine from both the manual backup (CV-0522A) and the normal (CV-0522B) steam supply paths, thus removing P-8B from service. The manual steam isolation valves for both of these paths were closed and caution tagged. Auxiliary Feedwater supply

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was promptly transferred to pump P-8C, when P-8B was shutdown. Electric motor driven pump P-8A was also operable and available for use.

Since the occurrence of this event, the point of piping failure has been excavated allowing external inspection of the piping and soil conditions. Prior to excavation, the failure location was identified by viewing the piping internally with a boroscope. Pitting of the internal surfaces of the piping could be seen during the boroscope examination around the area where the failure occurred. The piping was further inspected using the boroscope technique for about one hundred feet upstream of the point of failure after the failed segment was removed. This inspection covered the majority of the remaining portion of the buried piping, with no further pitting of the internal piping surface being observed, which provides some confidence that no other portions of the buried piping are close to the point of failure.

The Consumers Energy Metallurgy laboratory has been involved in supporting the cause determination for the failed piping segment. The metallurgy exams have confirmed that the pipe base material is consistent with the original specification of carbon steel pipe. Thus, there is no indication that the leak was due to an original piping material defect, piping damaged during handling in the field, or an error made during installation welding in the field. There was also no evidence of failure due to mechanical forces. The metallurgical examination did find extensive wall thinning that is originated from the outside diameter of the pipe. The wall thinning is more significant at the top of the pipe than at the bottom of the pipe. Analysis for both chemical and microbiological corrosion mechanisms are being completed. The most significant conclusion that can be drawn is that the failure occurred at this point in the pipe due to an externally driven corrosion mechanism that was not localized. This corrosion appears to exist, at least to some extent, over the entire range of piping made visible by the excavation. The metallurgists estimate that the corrosion rate has been relatively slow with estimates from 0.003" to 0.007" per year. Although it has not been fully confirmed, it appears that the original coating may have never been designed for the steam piping temperatures which this piping experiences in service. It has also been suggested that the organic based substance which was originally applied to the piping probably heated up and became fluid, which would have then allowed it to slump down the sides of the pipe under the wrapping due to gravity. This would have left the top of the piping with less protective coating than the bottom and made the top of the pipe more accessible for corrosion than the bottom of the pipe. This would be consistent with the metallurgical results of more thinning at the pipe top than at the bottom. Because there is no protective coating still intact on the removed piping sample, the above must remain a hypothesis, which will probably not be able to be confirmed. Therefore, the root cause appears to be degradation of the original piping protective cover leading to a slowly progressing corrosion of the exterior surface of the piping.

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Both complete replacement of the underground pipe, and rerouting the steam supply through the turbine building have been considered. First estimates indicate that either of these repair methods would cost in excess of one million dollars, and either would take longer than six weeks to design, fabricate and install. Because such a replacement has been judged to have no significant safety benefit, the expense of repair cannot be justified on the basis of maintaining operational flexibility.

Relevant History of Auxiliary Feedwater Pumps

The original design of the Palisades plant auxiliary feedwater system consisted of a single train having one electric motor driven pump (P-8A) and one steam turbine driven pump (P-8B) with a single underground steam supply that supplied auxiliary feedwater through a common set of valves and piping. The electric motor driven pump was not originally configured for automatic sequencing onto an emergency diesel generator and the steam supply for the steam turbine driven pump was connected downstream of the main steam isolation valve from the steam generator. Both pumps were installed in the safety related auxiliary feedwater pump room in the turbine building. Due to concerns in the event of a steam supply line break where the loss of the steam supply to the steam turbine driven pump could, given the single failure of the motor driven pump, result in loss of all auxiliary feedwater, a modification was completed in 1974 as part of the plant HELB modifications which moved the existing underground steam supply to upstream of the main steam isolation valve for steam generator E-50B and installed a second above ground steam supply upstream of the main steam isolation valve for steam generator E-50A to supply P-8B. At this point in time, both steam supplies to P-8B required manual initiation and the new above ground steam supply was established as the normal, or preferred full capacity steam supply, with the underground steam supply being a backup source. However, both steam supplies to P-8B were required at this time to alleviate single failure concerns during a steam supply line break event which could render both auxiliary feedwater pumps unavailable.

In response to NUREG-0578 in 1979, automatic initiation of the auxiliary feedwater system was established with a control circuit that started the electric motor driven pump (P-8A) followed by start of the steam turbine driven pump (P-8B) through CV-0522B, the normal above ground steam supply. Other modifications completed during this time period occurred due to fire concerns. These modifications included installation of nitrogen backup to instrument air for CV-0522B, the normal above ground steam supply to P-8B, and installation of a control switch for CV-0522B as well as flow control circuitry in the auxiliary hot shutdown panel (C-150). The backup underground steam supply, CV-0522A, was left as a manually actuated device with no backup to plant instrument air since it simply served as a redundant motive force at the time.

In the early 1980's as part of our NUREG-0737 action plan, a third auxiliary feedwater pump (P-8C) was installed by converting one of the three original high pressure safety injection pumps to provide an independent train of auxiliary

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feedwater supplied by an emergency diesel generator (on the opposite electrical train from that supplying P-8A). A key aspect of this modification was to eliminate single failure concerns since P-8A & P-8B were part of a single train residing in the same room (flooding concern) and providing flow through the same valves and piping. The new auxiliary feedwater pump, P-8C, and its associated flow control valves were located in the west engineering safeguards room of the auxiliary building to provide assurance of single failure protection (redundancy) from the P-8A/P-8B train, for which the pumps were located in the turbine building and the flow control valves in the component cooling water room of the auxiliary building.

An additional action taken in response to NUREG-0737 was to provide automatic sequencing of the two electric motor driven auxiliary feedwater pumps (P-8A & P-8C) onto the two separate emergency diesel generators. The automatic sequencing of auxiliary feedwater pumps, upon receipt of an actuation signal, was established as P-8A, followed by P-8C, followed by P-8B. Each subsequent pump will only start if flow is not established within a specified time of the previous pump start signal. As stated previously, only the normal above ground steam supply through CV-0522B was provided with automatic actuation controls for P-8B. With installation of the independent train provided by P-8C, the single failure concerns that had previously resulted in installation of the second steam line to P-8B were now superseded.

To meet the requirements of 10CFR50.62 (ATWS rule), the steam turbine control circuitry was modified to allow automatic start of the steam driven turbine and associated auxiliary feedwater pump upon loss of DC control power. This circuitry is associated with control of CV-0522B, which supplies steam through the normal above ground steam supply from steam generator E-50A.

3). **SAFETY BASIS SUPPORTING THE REQUEST**

Design Requirements

Current FSAR Chapter 14 safety analyses do not include any consideration for steam driven auxiliary feedwater pump P-8B. Furthermore, use of the backup underground steam supply through CV-0522A would require manual action in order to support accident mitigation and therefore, is not addressed as a valid option in any of the FSAR design basis events. Use of CV-0522A and the associated underground steam supply line is optional by current design and optional in off-normal or normal operating procedures. The underground steam supply line's importance changed with the installation of P-8C, Auxiliary Feedwater Pump, which eliminated single failure concerns associated with the previous redundant pump but single train auxiliary feedwater system provided by P-8A & P-8B.

The P-8C train provides an independent train which is not susceptible to common mode failures which would affect the P-8A/P-8B train from steam line breaks, seismic events, floods, missiles or fires. Although both trains take suction from a common

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condensate storage tank, the suctions for each train are provided by separate suction piping each with a separate emergency backup supply (firewater for P-8A/P-8B train and service water for P-8C train). Therefore, existence of the two independent trains of auxiliary feedwater (P-8A/P-8B train and P-8C train) provides independence as required by Branch Technical Position ASB 10-1 Items B.2 and B.4; existence of the two electrically powered and one steam turbine power auxiliary feedwater pump provides the diversity required by Branch Technical Position ASB 10-1 Items B.2. Multiple active component failures would be required to jeopardize auxiliary feedwater availability without consideration for the backup underground steam supply to P-8B. (Even with two steam supplies, a single turbine driven pump would not, by itself, be single failure proof to provide independence and redundancy.) Therefore, the backup underground steam supply is not required for a safety function to meet NUREG-0737 design requirements.

Design Basis Event Considerations

FSAR accident descriptions for Palisades do not address the existence of the backup underground steam supply through CV-0522A and therefore do not rely on the underground line for any mitigation of accidents. Current design is based on the automatically sequenced start of P-8A, followed by P-8C and then by P-8B through CV-0522B on the normal above ground steam supply. The auto start of P-8B is the last pump available based on all analysis and use is only considered through CV-0522B on the normal above ground steam supply. There is no single active component failure that combined with other required Chapter 14 analysis assumptions (including those that require the assumption of loss of offsite power) would require use of the backup underground steam supply for the auxiliary feedwater system to perform its required function.

Malfunctions evaluated in the FSAR and in related documents generally fit in the areas of line breaks, flooding and failures to start or properly operate. Failure of steam lines in the Auxiliary Feedwater Pump room assumes a line break and failure of both P-8A and P-8B. Resolution of such failures occurred with the installation of P-8C, which is housed in a separate structure in the auxiliary building.

In addition to the FSAR Chapter 14 accidents requirements, there are also requirements for Station Blackout and Post-Fire Safe Shutdown. Reliance on Auxiliary Feedwater is credited for decay heat removal during the 4 hour assumed duration of the Station Blackout Event, which requires no other single failure assumptions. During the 4 hour period, the turbine driven pump is used to supply auxiliary feedwater to both steam generators for removal of decay heat. However, the implied assumption is that the normal above ground normal steam supply through CV-0522B would be used. CV-0522B is the preferred valve, with backup nitrogen supply provided since the analysis assumes the normal air supply is lost. No credit is taken in the analysis for use of the backup underground steam supply through CV-0522A in support of cooldown either as a source of steam for P-8B or as a steaming path from steam generator E-50B.

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For the Post-Fire Safe Shutdown Analysis P-8C is the preferred source of feedwater for this event. Only one case exists where use of the underground steam supply through CV-0522A was considered as available to help the plant in achieving cold shutdown. This case is associated with a fire in the Southwest Cable Penetration Room, which will affect controls for P-8A, and CV-0522B. The analysis of record notes that either P-8C or CV-0522A would be available for supplying auxiliary feedwater to the steam generators but only requires one source of auxiliary feedwater. P-8C is the preferred source of feedwater for this event. In addition, the manual handwheel on CV-0522B is available for use in providing a steam supply to P-8B during this event.

In addition, 10 CFR 50 Appendix R requirements call for the plant to be able to achieve cold shutdown. Under certain assumed fires, the result is loss of both electrical driven auxiliary feedwater pumps. Being able to achieve cold shutdown requires the use of the steam from the steam generators at very low pressures. Post-modification testing demonstrated successful performance of the turbine driven pump through CV-0522B down to steam generator pressures below 39 psia. Since the performance was based on use of CV-0522B only (No parallel operation of the two steam lines) the analytical assumptions have only been verified for use of the normal above ground steam supply. In all cases the backup underground steam supply through CV-0522A is not relied upon to mitigate the event and therefore, is not required to fulfill any safety function.

Probabilistic Safety Assessment

The PSA group evaluated permanently disabling (isolating CV-0522A) the alternate steam supply line to AFW pump P-8B. Two different evaluations were performed: one using the risk monitoring software (EOOS) and one using the new revised PSAR1 model.

EOOS was used to determine the initial significance of failure of the alternate steam supply line to P-8B. Alternate steam supply valve CV-0522A was failed to obtain results. The result of the EOOS run was a risk achievement worth (RAW) = 1.00 and corresponding increase in core damage frequency (CDF) of 1.00E-7/yr. EOOS uses the Palisades IPE model and credits the use of the alternate shutdown panel for operation of P-8B.

Palisades updated the PSA model last year (1999) as PSAR1, but is not yet installed on EOOS. The updated PSAR1 (at-power, internal events) was re-quantified with the failure of CV-0522A set to true. The resultant evaluation from PSAR1 was a RAW = 1.11 and corresponding increase in CDF of 6.31E-6/yr. However, the alternate shutdown panel was not credited in the PSAR1 model. A screening value (probability of failure = .1) for the reliability of the alternate shutdown panel (only for those sequences affected by CV-0522A) was evaluated. This results in a RAW = 1.01 and corresponding increase in CDF of 7.28E-7/yr.

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Based on the EOOS evaluation and the PSAR1 model, permanently disabling the alternate steam supply line to AFW pump P-8B is below the Regulatory Guide 1.174 threshold of $1E-6$ /yr increase in CDF. Therefore, permanently disabling the alternate steam supply line to P-8B is considered to be non-safety significant.

4) **BASIS FOR CONCLUSION THAT GRANTING THE REQUEST WILL NOT BE DETRIMENTAL TO PUBLIC HEALTH AND SAFETY OR INVOLVE SIGNIFICANT HAZARDS CONSIDERATIONS**

The Palisades Nuclear Plant has evaluated plant operation in accordance with the proposed enforcement discretion and determined that such operation would not be detrimental to public health and safety, and would not involve a significant hazards consideration. The following is provided in support of that conclusion.

a. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed enforcement discretion would allow plant startup and operation without requiring the manual backup supply to the turbine driven auxiliary feedwater pump to be operable.

The backup underground steam line in question will be isolated from its associated steam generator and from the other normal above ground steam supply to P-8B during plant operation. In addition, the section of buried pipe that had corroded through has been replaced as well as thickness measurements taken of accessible portions of piping. Where measurements were obtained, the piping has been analytically demonstrated to maintain structural integrity for design pressures of 1000 psi (the subject piping only sees 250 psi when in operation due to pressure reducing control valves). Given this, in conjunction with visual examinations performed inside most of the remaining buried pipe which showed no internal pitting, a significant increase in the probability of a steam line rupture is not created. Since the backup underground steam supply is not credited in any plant safety analyses nor required for any design or license basis events, adequate redundancy in other required sources of supplying auxiliary feedwater exists such that no increase in consequences of an accident will result.

Therefore, this operation in accordance with the proposed enforcement discretion does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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b. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Operation of the plant in accordance with the proposed enforcement discretion will not add any new equipment, settings, or alter any plant operating methodology. The only change is the elimination of testing for an existing plant component. Functioning of that plant component is not assumed in any safety analyses. Since there will be no change in plant equipment, settings, or normal operating methodology, operation in accordance with the proposed enforcement discretion will not create the possibility of a new or different kind of accident from any accident previously evaluated.

c. Does this change involve a significant reduction in a margin of safety?

The proposed enforcement discretion will allow operation of the plant while the manual backup steam supply to the turbine driven auxiliary feedwater pump is inoperable. There are no analyzed accidents which assume that the manual backup steam supply is used to mitigate the effects of the accident. A Probabilistic Safety Analysis, comparing plant operation with and without the manual backup steam supply available, has shown there to be no significant change in risk. Therefore, the change does not involve a significant reduction in the margin of safety.

Because operation in accordance with the proposed enforcement discretion will not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety, it will not be detrimental to public health and safety or involve significant hazards considerations.

5) **BASIS FOR CONCLUSION THAT GRANTING THE REQUEST WILL NOT INVOLVE ADVERSE ENVIRONMENTAL CONSEQUENCES**

Because operation in accordance with the proposed enforcement discretion will not involve a significant increase in the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety, it would not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite as a result of an accident, nor would it result in a significant increase in individual or cumulative occupational radiation exposure.

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6) COMPENSATORY MEASURES TO BE TAKEN

The underground steam line in question will be isolated from its associated steam generator and from the other steam supply to Pump P-8B during plant operation. These actions will limit the possibility of additional steam leaks from the subject piping and of the buried piping affecting the normal steam supply to Pump P-8B. Required monthly testing of P-8B will also provide opportunity to verify that isolation from the normal steam supply to Pump P-8B remains adequate.

7) JUSTIFICATION FOR REQUESTED DURATION OF ENFORCEMENT DISCRETION

It is requested that the proposed enforcement discretion (allowing plant operation without compliance to the requirements of TS 4.9a.2 which apply to the manual backup steam supply to pump P-8B) be effective for sufficient time to allow a TS change to be processed removing the subject requirements from the TS. Since, as discussed above, granting the request will not be detrimental to public health and safety, the requested duration is deemed to be reasonable.

8) CONFIRMATION OF PRC REVIEW AND RECOMMENDATION FOR APPROVAL

The Palisades Plant Review Committee has reviewed this request, and has concluded that operation of the facility in accordance with the proposed enforcement discretion does not involve a significant hazard consideration as defined in 10 CFR 50.92. The Palisades Plant Review Committee recommends approval of this request for a Notice of Enforcement Discretion.

9) CRITERION UNDER WHICH NOED SHOULD BE GRANTED

This request for enforcement discretion meets Criterion 3.a. Palisades is currently in the startup process, however, the equipment involved does not perform a required safety function in any mode of operation.

This request for enforcement discretion also meets Criterion 3.c. The portion of the specified surveillance of TS 4.9a.2, which requires starting the steam driven auxiliary feedwater pump utilizing the control room switch associated with the manual backup steam supply, is inappropriate and unnecessary for any plant condition, in that it does not provide a safety benefit.

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10) MARKED UP TECHNICAL SPECIFICATION PAGE

A Technical Specification Change Request will be submitted to revise specification 4.9a.2 to read, *"The operability of the steam driven pump shall be verified by starting alternately from the control room switch for the primary steam supply (CV-0522B) and from the pump test-key switch."*

11) OTHER INFORMATION

A TS change request, for both the current TS and the Improved TS, is being prepared to remove the requirements associated with the manual backup steam supply for pump P-8B. That TS change request will be submitted within 48 hours after approval of the requested Notice of Enforcement Discretion.