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U.S. Nuclear Regulatory Commission
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Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS: REVISION TO PROPOSED IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.7, PLANT SYSTEMS

On January 26, 1998, Consumers Energy Company submitted a Technical Specification Change Request (TSCR) to convert the Palisades Current Technical Specifications (CTS) to closely emulate the Standard Technical Specifications for Combustion Engineering Plants, NUREG-1432 (STS). During their review of that submittal, the NRC staff provided several comments on the proposed Improved Technical Specifications (ITS) and the associated bases. During the preparation of our response to those comments, Consumers Energy realized that certain provisions of the CTS had been inappropriately replaced with corresponding provisions from the STS. This letter provides corrections to our earlier submittals.

In ITS LCOs 3.7.7, Component Cooling Water (CCW), and 3.7.8, Service Water System (SWS), the description of Condition A has been revised to allow continued operation with component failures affecting both required trains provided the required function is not lost. This allowance is a provision of CTS.

This correction will provide consistency in the presentation of required actions for the fluid systems required by ITS. It will also remove the requirement for a plant shutdown in conditions where component failures affect the operability of both required trains of CCW or SWS, but where there is sufficient equipment still operable to provide the cooling capability assumed in the accident analyses. This condition could be created by the concurrent inoperability of two CCW pumps or two SWS pumps, or by the inoperability of a single component affecting the operability of each train (when operating alone), but not causing a loss of function when the remaining components of both trains are available.

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It is not anticipated that such a condition will occur frequently, however, there have been instances when two CCW pumps were concurrently inoperable. Amendment 22 was issued to clarify the CTS requirements in just such a case. There are several valves in the CCW and SWS systems which receive signals from both instrumentation trains (see attached sketches). Since these valves are associated with both trains, their failure would affect the operability of both trains. For the larger valves, failure to close could cause enough flow diversion to disable one train, operating alone, but would not disable both trains, operating together. If all three CCW or SWS pumps were operating there would be adequate flow to all safety related components even if one of these valves did fail to close. CTS LCO 3.4 provides an explicit condition to allow 24 hours to rectify either of these situations.

The Allowed Outage Time (AOT) for two pumps (trains in ITS) being inoperable or for "any valve, interlock, or piping" being inoperable (one or more trains in ITS) has been increased from 24 hours to 72 hours (provided that there is no loss of function). This longer AOT is that typically used in STS and ITS for conditions where there is a loss of redundancy, but not a loss of function. The longer AOT for CCW and SWS component failures has been justified in DOCs 3.7.7 L.1 and 3.7.8 L.1.

The following Enclosures to this letter have been provided:

Enclosure 1 contains revised ITS pages for LCOs 3.7.7 and 3.7.8. The revised text is identified by marks in the margin, and the revised pages have been dated for identification.

Enclosure 2 contains revised Bases pages for LCOs 3.7.7 and 3.7.8. The revised text is identified by marks in the margin, and the revised pages have been dated for identification.

Enclosure 3 contains revised CTS LCO 3.4 marked-up pages and revised DOCs L.1 for ITS LCOs 3.7.7 and 3.7.8.

Enclosure 4 contains revised NSHCs associated with DOCs L.1 for ITS LCOs 3.7.7 and 3.7.8. The revised text is identified by marks in the margin.

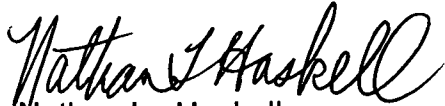
Enclosure 5 contains revised marked-up STS pages and STS Bases pages.

Enclosure 6 contains new JFDs for the subject changes. The revised text is identified by marks in the margin.

Enclosure 7 contains an explanation and justification of the proposed revision, sketches of the Palisades CCW and SWS systems, and a copy of CTS LCO 3.4.

SUMMARY OF COMMITMENTS

This submittal contains no new commitments and no revisions to existing commitments.



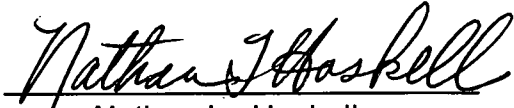
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CC Administrator, Region III, USNRC
Project Manager, NRR, USNRC
NRC Resident Inspector - Palisades

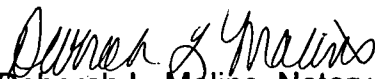
Enclosures

**CONSUMERS ENERGY COMPANY
REVISION TO PROPOSED IMPROVED TECHNICAL SPECIFICATIONS
SECTION 3.7, PLANT SYSTEMS**

To the best of my knowledge, the content of this submittal revising proposed LCOs 3.7.7 and 3.7.8 of our January 26, 1998 License Amendment request for conversion to Improved Technical Specifications, is truthful and complete.


Nathan L. Haskell
Director, Licensing

Sworn and subscribed to before me this 19th day of July 1999.


Deborah L. Malins, Notary Public
Van Buren County, Michigan
My commission expires September 17, 2000