

July 30, 1999

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

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS; CORRECTIONS IN RESPONSE TO NRC COMMENTS AND EDITORIAL CHANGES**

On January 26, 1998, Consumers Energy Company submitted a Technical Specification Change Request (TSCR) to convert the Palisades Technical Specifications to closely emulate the Standard Technical Specifications for Combustion Engineering Plants, NUREG-1432. During their review of that submittal, the NRC staff provided several comments on the proposed Technical Specifications and the associated bases. This letter provides a revision to the instrument channel drift measurement submitted on June 11, 1999; corrections made in response to NRC comments on our RAI responses for Sections 3.3, 3.5, and 3.6; and some editorial revisions necessary for consistency within the ITS. Clean pages reflecting these changes will be provided with the certified ITS in a later submittal.

The following changes have been made:

1. The notes in the Surveillance Requirements (SR) of several ITS Sections have been editorially revised for consistency throughout the ITS. These changes do not alter any requirements, and are solely made to provide consistent wording of equivalent SR notes throughout the ITS. The revised wording reflects the guidance of the Writer's Guide. The changes are provided as marked-up pages in Enclosure 1.
2. Two groups of changes were made to ITS Section 3.3. These changes have been discussed with the NRC reviewer for Section 3.3.
  - a) The LCOs and Bases for ITS Section 3.3 have been revised to provide editorial corrections and clarifications. These changes were made in response to comments from the NRC staff review of our June 6, 1999 RAI response for ITS Section 3.3. Corrected pages, with revisions noted in the margins, are provided in Enclosure 2.

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- b) The marked-up of CTS page 4-77 and several DOC pages have had minor errors corrected. These pages are provided in Enclosure 2.
3. The Required Actions associated with LCO 3.5.3 have been revised to be consistent with those for a similar plant equipment condition, in LCO 3.4.6. In LCO 3.5.3, the Condition A provides Action Requirements when there are no operable Low Pressure Safety Injection (LPSI) trains; in LCO 3.4.6, Condition A provides Action Requirements when there are no operable trains of Shutdown Cooling (SDC). Since the LPSI pumps and much of the LPSI piping is used for shutdown cooling, this change makes these Action Requirements the same. Conforming changes have been made to the Bases and supporting documentation.

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This change was made in response to a comment from the NRC staff review of ITS Section 3.5. Marked-up pages, showing the changes, are provided in Enclosure 3.

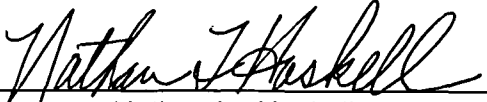
4. The following changes have been made to ITS Section 3.6. A discussion of these changes is provided in Enclosure 4.
- a) Several editorial changes have been made to ITS Section 3.6 in response to NRC comments from our July 1, 1999 meeting with the Staff.
  - b) The Service Water flow rate required by SR 3.6.6.4 for the Containment Air Coolers has been revised to reflect recent changes to the safety analyses and system flow balancing. A conforming change has been made to the Bases.
  - c) The Bases for SR 3.6.2.1 has been revised to include a clarification of the relationship between the ITS term "Containment Operability" and the Appendix J term "Containment Integrity".

Marked-up pages, showing the changes, are provided in Enclosure 4.

5. The documentation supporting several changes previously classified as "LA" changes (which moved details of requirements to procedures) have been revised and reclassified as "L" changes (which provide justification for deletion of those details). These changes have been made in response to suggestions from the NRC staff review of the ITS. The changes are provided as replacement pages in Enclosure 5.
6. The Instrument Channel Drift data submitted as Enclosure 7 to our June 11, 1999 RAI response has been revised to better explain the drift implications of our "as found" and "as left" measurements. The revised data provided in Enclosure 6 of this letter replaces the formerly submitted data in its entirety.

SUMMARY OF COMMITMENTS

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



Nathan L. Haskell  
Director, Licensing

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

Enclosures

**CONSUMERS ENERGY COMPANY  
CORRECTIONS IN RESPONSE TO NRC COMMENTS AND EDITORIAL CHANGES**

To the best of my knowledge, the content of this submittal of corrections in response to NRC comments and editorial changes for our January 26, 1998 License Amendment request for conversion to Improved Technical Specifications, is truthful and complete.

*Nathan L. Haskell*

Nathan L. Haskell  
Director, Licensing

Sworn and subscribed to before me this 30<sup>th</sup> day of July 1999.

*Mary Ann Engle*

Mary Ann Engle, Notary Public  
Berrien County, Michigan  
(Acting in Van Buren County, Michigan)  
My commission expires February 16, 2000

