

A CMS Energy Company

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U.S. Nuclear Regulatory Commission  
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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT  
SITE EMERGENCY PLAN CHANGES**

Attached is a description of recent changes made to the Palisades Site Emergency Plan, excluding minor and editorial changes not requiring further explanation.

The changes do not decrease the effectiveness of the Palisades Site Emergency Plan and are in compliance with 10 CFR 50.54(q). The Palisades Site Emergency Plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

SUMMARY OF COMMITMENTS

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

*Nathan L. Haskell*  
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Director, Licensing

CC Administrator, Region III, USNRC (2 copies)  
Project Manager, NRR, USNRC  
NRC Resident Inspector - Palisades

Attachment

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**ATTACHMENT**

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

**PALISADES NUCLEAR PLANT  
SITE EMERGENCY PLAN CHANGES**

## **PALISADES NUCLEAR PLANT SITE EMERGENCY PLAN CHANGES**

### Palisades Site Emergency Plan, Section 2, Revision 4

This revision removed the reference to the Emergency Operations Facility Implementing Procedures. These procedures contained information needed to activate and operate the Emergency Operating Facilities (EOFs) for Big Rock Point and Palisades. The EOF Procedures are being canceled because under the approved Big Rock Point Defueled Emergency Plan, Big Rock is no longer required to have an EOF. The information specific to Palisades has been incorporated into the Palisades Emergency Implementing Procedures.

### Palisades Site Emergency Plan, Section 4, Revision 25

The principal change in this revision involves the methods of detection of an Unusual Event for the loss of offsite AC power and the loss of emergency onsite AC power. The wording for the method of detection for the loss of offsite AC power is changed to correspond with the wording in Section 3.7 of the Palisades Technical Specifications. The method of detection for loss of emergency onsite AC power is now identified as both Emergency Diesel Generators inoperable for greater than two hours (formally one hour) AND PCS temperature greater than 210° F (formally 300° F). These parameter changes are being made to agree with Technical Specification Amendment 180 which was approved April 29, 1998.

### Palisades Site Emergency Plan, Section 5, Revision 15

Figure 5.2, "Plant Staffing and Augmentation Guidelines", was revised to remove information from notes located below Figure 5.2 which indicated that on-shift staffing levels may be reduced when the reactor is defueled. This reduction had been approved by the NRC on September 21, 1990 specifically for the replacement of steam generators. The information was not removed from the Site Emergency Plan when the steam generator replacement outage was completed. This was discovered in August 1998 and a Condition Report Corrective Action was initiated to remove the information from the Plan.

### Palisades Site Emergency Plan, Section 8, Revision 12

Revision 12 removed the requirement to conduct a monthly communication test with Region III Operations Center. This test is required in Section IV.E.9.d of Appendix E to 10 CFR Part 50. Consumers Energy requested an exemption from the Appendix E requirement in a letter dated October 7, 1997. The NRC response to this request, dated April 29, 1998, indicated that an exemption is not needed because the monthly test with the NRC Headquarters Operations Center meets the requirement for testing both Headquarters and Regional Office Operations Centers communications.