

December 19, 2001

Mr. Douglas E. Cooper
Site Vice President
Palisades Plant
Nuclear Management Company, LLC
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

SUBJECT: PALISADES PLANT - ISSUANCE OF AMENDMENT TO EXTEND
SURVEILLANCE REQUIREMENT INTERVALS (TAC NO. MB3282)

Dear Mr. Cooper:

The Commission has issued the enclosed Amendment No. 206 to Facility Operating License No. DPR-20 for the Palisades Plant. The amendment changes the Operating License in response to your application dated October 26, 2001.

The amendment adds a condition to the Operating License to extend certain Technical Specification surveillance requirement intervals, on a one-time basis, to permit them to be performed during the upcoming rescheduled refueling outage, but no later than April 30, 2003.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Darl S. Hood, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosures: 1. Amendment No. 206 to DPR-20
2. Safety Evaluation

cc w/encls: See next page

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DISTRIBUTION

PUBLIC	OGC	HLi	CHolden
PDIII-1 Reading	ACRS	PGill	EMarinos
WReckley	WBeckner	YHsii	FAkstulewicz
DHood	AVegel, RGN-III	SJones	
RBouling	GHill(2)	BThomas	

*Provided SE input by memo

OFFICE	PDIII-1/PM	PDIII-1/LA	EEIB/SC*	EEIB/SC*	SRXB/SC*	SPLB/SC(A)	OGC	PDIII-1/SC(A)
NAME	DHood	RBouling	CHolden	EMarinos	FAkstulewicz	BThomas	RHoefling	WReckley
DATE	12/13/01	12/13/01	11/27/01	11/15/01	11/08/01	12/13/01	12/17/01	12/18/01

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Palisades Plant

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November 2001

NUCLEAR MANAGEMENT COMPANY, LLC

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 206

License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Nuclear Management Company, LLC (the licensee) dated October 26, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, Facility Operating License No. DPR-20 is hereby amended as indicated in the attachment to this license amendment.
3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

William D. Reckley, Acting Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Operating License

Date of Issuance: December 19, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 206

FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following page of Operating License No. DPR-20 with the attached revised and additional pages. The revised and additional pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

4
-

INSERT

4
4a

- For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

- (5) In lieu of the specified frequencies, NMC may complete the surveillance requirements (SRs) noted in Table 2.C.(5) on Page 4a during the next refueling outage, but not later than April 30, 2003.

- D. The facility has been granted certain exemptions from the requirements of Section III, G of Appendix R to 10 CFR Part 50, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." This section relates to fire protection features for ensuring the systems and associated circuits used to achieve and maintain safe shutdown are free of fire damage. These exemptions were granted and sent to CPCo* in letters dated February 8, 1983, July 12, 1985, and July 23, 1985.

In addition, the facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedules and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted and sent to CPCo* in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

*On March 11, 1997, the name "Consumers Power Company" was changed to "Consumers Energy Company." Nuclear Management Company, LLC, hereinafter referred to as NMC, succeeds Consumer Energy Company as operator of the Palisades Plant. Consequently, NMC is authorized to act as agent for Consumers Energy Company and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

TABLE 2.C.(5)	
Surveillance Requirement	Description
SR 3.3.3.3 (for Table 3.3.3-1, Item 3.a)	Channel Calibration of Safety Injection and Refueling Water Tank Low Level.
SR 3.3.4.3 (for Table 3.3.4-1, Item 1)	Channel Functional Test of Safety Injection Signal (SIS) function.
SR 3.3.4.3 (for Table 3.3.4-1, Item 3)	Channel Functional Test of Recirculation Actuation Signal function.
SR 3.3.5.1	Channel Functional Test of Diesel Generator Undervoltage Start logic.
SR 3.5.2.8 (High Pressure Safety Injection to Hot Leg 1 Valves MO-3082 and MO-3083 only)	Throttle valve position stop is in correct position.
SR 3.7.8.2 (Noncritical Service Water Header Isolation Valve CV-1359 only)	Automatic valve actuates to the correct position on actual or simulated actuation signal.
SR 3.8.1.7	Emergency AC power performs as required on actual or simulated loss of offsite power (LOOP) signal.
SR 3.8.1.9	Emergency AC power performs as required on actual or simulated restoration of offsite power.
SR 3.8.1.10	Load sequencing for each automatic load sequencer.
SR 3.8.1.11	Emergency AC power performs as required on actual or simulated LOOP signal in conjunction with actual or simulated SIS.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 206 TO FACILITY OPERATING LICENSE NO. DPR-20
NUCLEAR MANAGEMENT COMPANY, LLC
PALISADES PLANT
DOCKET NO. 50-255

1.0 INTRODUCTION

By application dated October 26, 2001, Nuclear Management Company, LLC (NMC or the licensee) requested an amendment to change the Operating License (OL) for the Palisades Plant. The proposed amendment would add a condition to the OL to extend, on a one-time basis, certain Technical Specification surveillance requirement (SR) intervals. Specifically, the amendment would add the following License Condition, including Table 2.C.(5) (Attachment):

- 2.C.(5) In lieu of the specified frequencies, NMC may complete the surveillance requirements (SRs) noted in Table 2.C.(5) on Page 4a during the next refueling outage, but not later than April 30, 2003.

2.0 EVALUATION

The licensee has rescheduled the next refueling outage at Palisades to start in early 2003 because the plant is currently in a forced extended outage to replace all of the control rod drive mechanism (CRDM) upper housings. The normal interval for performing the SRs addressed by this amendment is 18 months, not to exceed 22.5 months, per SR 3.0.2. These SRs, which are performed during a refueling outage, were last performed during the 2001 refueling outage that concluded May 10, 2001. Thus, the licensee requests that the SR intervals be extended up to 65 days, but no later than April 30, 2003, to permit them to be performed during the next refueling outage. The specified SRs are those which cannot reasonably be performed during the current forced outage and whose current SR schedules will expire before the rescheduled refueling outage in 2003.

2.1 Changes to SR 3.3.3.3 (for Table 3.3.3-1, Item 3.A) and SR 3.3.4.3 (for Table 3.3.4-1, Item 3)

The Commission's regulatory requirements regarding SRs are set forth in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.36, "Technical Specifications," paragraph (c)(3). SRs are requirements relating to tests, calibrations, or inspections which assure that the necessary quality of systems and components is maintained, facility operation will be within safety limits, and limiting conditions for operation (LCOs) will be met.

LCO 3.3.3, "Engineered Safety Features (ESF) Instrumentation," requires that all channel components necessary to provide an ESF actuation be operable for certain specified modes of operation. SR 3.3.3.3 (see TS Table 3.3.3-1, Item 3a) requires a channel calibration, every 18 months, on the low-level switches of the safety injection and refueling water tank (SIRWT). This channel calibration is a complete check of the instrument channel, including the sensor. The surveillance verifies that the channel responds to a measured parameter within the necessary range and accuracy. Channel calibration leaves the channel adjusted to account for instrument drift between successive calibrations to ensure that the channel remains operational between successive surveillances. The 18-month frequency is based upon the assumption of equipment drift in the setpoint analysis.

LCO 3.3.4, "Engineered Safety Features (ESF) Logic and Manual Initiation," requires that all components necessary to provide an ESF actuation be operable for certain specified modes. SR 3.3.4.3 requires a channel functional test, every 18 months, on the recirculation actuation signal (RAS) actuation logic channels. The surveillance verifies that the required channels will perform their intended function when needed. The 18-month frequency is based upon the need to perform this surveillance under the conditions that apply during a plant outage.

SR 3.3.3.3 (for Table 3.3.3-1, Item 3.a) and SR 3.3.4.3 (for Table 3.3.4-1, Item 3) can only be performed when the plant is shut down. The licensee states that these SRs were last completed on April 18, 2001. Based on the TS interval of 18 months and the 25-percent extension allowed by SR 3.0.2, the SRs would need to be performed no later than March 4, 2003. Due to the current forced extended outage at Palisades to replace CRDM housings, the licensee has rescheduled the next refueling outage beyond the March 4, 2003, deadline. The licensee proposes to extend these two SR intervals 57 days, which would allow them to be completed during the next refueling outage, but no later than April 30, 2003.

The licensee stated that the SIRWT low-level switches have been in service since 1971 and have not had a failure affecting their ability to perform their design function. Review of the last three performances of the related test procedure (for the 1998, 1999, and 2001 refueling outages) showed that the SIRWT low-level switches and RAS actuation logic channels have performed without failure on each occasion. In addition, the as-found values for the SIRWT low-level switches were found to be within tolerance on all occasions and no adjustments were made. This indicates that instrument drift has been minimal in the past 5 years. This trend is expected to continue during the 57-day extension being requested. Therefore, the proposed extension would not significantly impact SIRWT low-level switch and RAS actuation logic performance, reliability, and monitoring.

The NRC staff has evaluated the licensee's circumstance and the justifications provided. On the basis of the favorable history of the instruments and the short duration of the proposed extension, the NRC staff concludes that the proposed changes to extend SR 3.3.3.3 and SR 3.3.4.3 would have no significant adverse impact upon the safety of plant operation, and are, therefore, acceptable.

2.2 Changes to SR 3.3.4.3 (For Table 3.3.4-1, Item 1), SR 3.7.8.2 (Noncritical Service Water Header Isolation Valve CV-1359 only), SR 3.8.1.7, SR 3.8.1.9, SR 3.8.1.10, and SR 3.8.1.11

LCO 3.3.4, "Engineered Safety Features (ESF) Logic and Manual Initiation," requires that all components necessary to provide an ESF actuation be operable. SR 3.3.4.3 (for Table 3.3.4-1, Item 1) requires that, every 18 months, a channel functional test is to be performed on the safety injection signal (SIS) manual initiation channels, actuation logic channels, and bypass removal channels.

LCO 3.7.8, "Service Water System (SWS)," requires that two SWS trains are to be operable for Modes 1, 2, 3, and 4. This ensures that the system functions to remove post accident heat loads, even if the worst single active failure should occur coincident with the LOOP. SR 3.7.8.2 requires that, for Modes 1, 2, and 3, each SWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position be verified every 18 months to actuate to the correct position on an actual or simulated actuation signal. One of the SWS valves that receives an automatic actuation signal from the SIS to close is control valve CV-1359, the noncritical service water header isolation valve.

LCO 3.8.1, "AC [alternating current] Sources--Operating," requires the operability of two qualified circuits between the offsite transmission network and the onsite Class 1E electrical power distribution system and an independent diesel generator (DG) to each ESF train. This ensures the availability of the power required to shut the reactor down and maintain it in a safe shutdown condition following an anticipated operational occurrence or a postulated design-basis accident (DBA). SRs 3.8.1.7, 3.8.1.9, 3.8.1.10, and 3.8.1.11 are performed when the plant is shut down (Modes 5 or 6) at an interval of 18 months:

SR 3.8.1.7 demonstrates the as-designed operation of the standby power sources during a LOOP. This SR verifies actions that are required for re-energizing the safety buses and loads from the DG after an occurrence of a LOOP. SR 3.8.1.9 verifies that the manual transfer of the safety buses and loads can be made from the DG to the offsite power source and that the DG can be returned to the ready-to-load status after the LOOP event. SR 3.8.1.10 verifies the proper sequencing of the loads onto the safety buses by the automatic load sequencer after a power loss. SR 3.8.1.11 verifies that the DGs are capable of supplying the necessary power to the safety buses in the event of a DBA coincident with a LOOP to ensure safe shutdown of the reactor. During the performance of these surveillances, all equipment actuated by SIS and/or LOOP is tested. These surveillances verify that the required channels will perform their intended functions when needed.

These SRs were last performed on April 10 and 11, 2001, for the right trains and on April 17, 2001, for the left trains. On the basis of the current 18-month interval and recognizing the 25-percent extension allowed by SR 3.0.2, these surveillances would be due by February 24 or 25 (right trains) and March 3, 2003 (left trains). Completion of these SRs on their current due dates would require either conducting these surveillances during the current forced outage or an early entry into the next refueling outage. The licensee states that completion of these SRs during the current forced outage is not practical because the alignment and control of plant

equipment to support performing these tests would create a potential challenge to reactor safety without providing an overall benefit in safety. The licensee has proposed to extend these surveillances by 64 or 65 days so that they can be performed during the next refueling outage as rescheduled, but no later than April 30, 2003.

In Enclosure 4 of the October 26, 2001, application, the licensee states that its review of the past three refueling outages when these surveillances were conducted has shown that these surveillances were performed without failure (i.e., the equipment has functioned as designed) on each occasion. To assure that the equipment and features associated with the SIS and LOOP function as intended, the licensee will continue to conduct channel testing to support a related SR (SR 3.3.4.1, which regards functional testing of each SIS actuation channel normal and standby power functions) every 92 days. SR 3.3.4.1 is conducted using an installed test circuit to test many features associated with an SIS and a LOOP. Also, to assure that the onsite distribution equipment (including the DG systems) functions as intended, the licensee will continue to conduct monthly DG testing required by LCO 3.8.1, which demonstrates DG operability. These ongoing activities will provide opportunities to promptly identify and correct conditions that may impact SIS actuations or DG system operation. This will provide assurance that the SIS or DG system will function properly if needed.

Based on the above information, the NRC staff concludes that the proposed change of a one-time extension of the surveillance interval for SR 3.3.4.3 (for Table 3.3.4-1, Item 1), SR 3.7.8.2 (for valve CV-1359), SR 3.8.1.7, SR 3.8.1.9, SR 3.8.1.10, and SR 3.8.1.11 for up to 65 days, not to exceed April 30, 2003, would have no significant impact on SIS actuations or the DG operations. Therefore, the proposed change is acceptable.

2.3 Changes to SR 3.3.5.1

LCO 3.3.5, "Diesel Generator (DG)-Undervoltage Start (UV Start)," requires that three channels per bus of each UV Start instrumentation function be operable when the associated DG is required to be operable. The UV Start supports safety systems associated with ESF actuations. SR 3.3.5.1 currently requires that, at least once per 18 months, DG UV start logic be demonstrated operable by performing a channel functional test on each UV Start logic channel to ensure that the logic channel will perform its intended function when needed. SR 3.3.5.1 is performed with integrated DBA surveillance procedures that are performed when the plant is shutdown. All equipment actuated by an SIS and/or a LOOP are tested during performance of these procedures. The frequency of 18 months is based upon the plant conditions necessary to perform the test. SR 3.3.5.1 was last completed on April 11, 2001, for the right channel, and April 17, 2001, for the left channel. Recognizing the 25-percent extension allowed by SR 3.02, SR 3.3.5.1 would become due on February 25, 2003 (for the right channel), and March 3, 2003 (for the left channel). Completing these SRs to the current requirement would require either conducting these surveillances during the current forced outage or would require an early entry into the next refueling outage. The licensee states that completion of these SRs during the current CRDM outage is not practical. The licensee proposes that these surveillances be extended 64 days on a one-time basis, not to exceed April 30, 2003, so that they may be performed during the next refueling outage currently rescheduled for 2003.

In Enclosure 5 of the October 26, 2001, application, the licensee states that a review of the past three refueling outages when these surveillances were conducted shows that these surveillances were performed without failure on each occasion. To assure that UV Start instrumentation functions as intended, the licensee will calibrate the UV sensing relays during the current forced outage, per SR 3.3.5.5. Also, the licensee will continue to conduct monthly DG testing required by LCO 3.8.1, which demonstrates DG operability. These activities will assure that conditions which could impact DG UV operation would be promptly identified and corrected. This will provide assurance that the DG UV start instrumentation will function properly if needed.

On the basis of the above information, the NRC staff concludes that the proposed change of a one-time extension of SR interval for SR 3.3.5.1 for 64 days, not to exceed April 30, 2003, would have no significant adverse impact upon the DG UV function. Therefore, the proposed change is acceptable.

2.4 Changes to SR 3.5.2.8 (High Pressure Safety Injection to Hot Leg 1 Valves MO-3082 and MO-3083 Only)

TS LCO 3.5.2, "ECCS - Operating," specifies that two ECCS trains shall be operable in Modes 1, 2, and 3. SR 3.5.2.8 requires verification, once per 18 months, of the correct stop position of each of the ECCS throttle valves listed on SR 3.5.2.8 (i.e., four low pressure safety injection throttle valves to the cold legs, and two high-pressure safety injection (HPSI) throttle valves to the hot legs). For this license amendment, the licensee requests that the surveillance schedule be extended for the two HPSI to hot-leg 1 throttle valves (i.e., MO-3082 and MO-3083) only.

The HPSI hot leg injection is used in the post loss-of-coolant accident (LOCA) long-term cooling to flush the core to prevent a core flow blockage due to boron precipitation. In each of the two ECCS trains, injection piping is connected to a hot leg from the HPSI header. This hot-leg injection piping contains a flow orifice and a motor-operated throttle-isolation valve that will be manually opened during the post-LOCA long-term cooling phase to admit HPSI injection flow to the hot leg. The valve open position limit switch is set to establish a predetermined flow split between the hot leg and cold legs. SR 3.5.2.8 requires verification, once per 18 months, that the open position stop of each hot leg MOV is in the correct position.

The TS Bases for SR 3.5.2.8 states that the 18-month surveillance frequency is based upon the need to perform these surveillances under the conditions that apply during a plant outage and the potential for unplanned transients if the surveillances were performed with the reactor at power. Since the testing of hot-leg HPSI throttle valves requires the operation of the HPSI pumps with full flow injecting into the primary coolant system, SR 3.5.2.8 hot-leg injection valve surveillance can only be performed during a refueling outage with the reactor vessel head removed. This is necessary to comply with the low-temperature overpressure protection (LTOP) requirement of LCO 3.4.12, which requires that both HPSI pumps be incapable of injecting into the primary coolant system in Modes 3, 4, and 5, and in Mode 6 when the head is on the reactor vessel.

In Enclosure 6 of the October 26, 2001, application, the licensee states that SR 3.5.2.8 was last completed on April 12, 2001, and that under the current surveillance interval of 18 months plus the 25-percent allowance of SR 3.0.2, the next SR would need to be completed by February 26, 2003. Since the next refueling outage has been rescheduled, the licensee is requesting an extension of up to 63 days, until April 30, 2003, to complete SR 3.5.2.8 for the two valves.

The TS Bases for SR 3.5.2.8 also states that the 18-month surveillance frequency is based upon consideration of the design reliability of the equipment and operating experience, and that the equipment performance is monitored as part of the inservice testing program. The licensee also stated that (1) a review of the last three performances of the related test procedure showed that the hot leg injection valves performed without failure on each occasion, (2) these hot leg injection valves meet the Palisades Maintenance Rule program goals for both availability and reliability, and (3) no maintenance has been performed on these valves since the last surveillance test that could affect the flow rate. Therefore, the NRC staff concludes that the proposed 63-day extension until the next refueling outage for the surveillance of the hot leg injection valves would have an insignificant impact upon the public health and safety considering the reliability of the valves and highly unlikely probability of a large-break LOCA occurring during the extended time. In addition, the proposed extension would allow the surveillance to be performed in Mode 6 with the reactor head removed so as to comply with the LTOP requirement.

Therefore, the proposed addition of License Condition 2.C.(5) to provide a one-time extension for the surveillance of the HPSI to hot-leg 1 injection valves MO-3082 and MO-3083 until the next refueling outage, but no later than April 30, 2003, is acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official agreed with the NRC staff's proposed issuance of the amendment.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (66 FR 56865). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based upon the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Attachment: Table 2.C.(5)

Principal Contributors: D. Hood
H. Li
P. Gill
Y. Hsui

Date: December 19, 2001

TABLE 2.C.(5)	
Surveillance Requirement	Description
SR 3.3.3.3 (for Table 3.3.3-1, Item 3.a)	Channel Calibration of Safety Injection and Refueling Water Tank Low Level.
SR 3.3.4.3 (for Table 3.3.4-1, Item 1)	Channel Functional Test of Safety Injection Signal (SIS) function.
SR 3.3.4.3 (for Table 3.3.4-1, Item 3)	Channel Functional Test of Recirculation Actuation Signal function.
SR 3.3.5.1	Channel Functional Test of Diesel Generator Undervoltage Start logic.
SR 3.5.2.8 (High Pressure Safety Injection to Hot Leg 1 Valves MO-3082 and MO-3083 only)	Throttle valve position stop is in correct position.
SR 3.7.8.2 (Noncritical Service Water Header Isolation Valve CV-1359 only)	Automatic valve actuates to the correct position on actual or simulated actuation signal.
SR 3.8.1.7	Emergency AC power performs as required on actual or simulated loss of offsite power (LOOP) signal.
SR 3.8.1.9	Emergency AC power performs as required on actual or simulated restoration of offsite power.
SR 3.8.1.10	Load sequencing for each automatic load sequencer.
SR 3.8.1.11	Emergency AC power performs as required on actual or simulated LOOP signal in conjunction with actual or simulated SIS.