

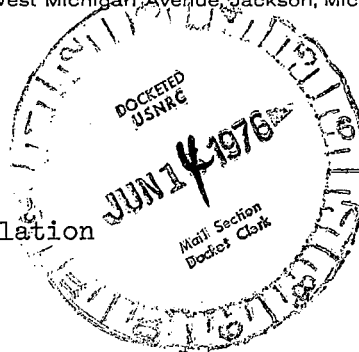


**Consumers
Power
Company**

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

June 9, 1976

Director of Nuclear Reactor Regulation
Att: Mr Robert A. Purple, Chief
Operating Reactor Branch No 1
US Nuclear Regulatory Commission
Washington, DC 20555



DOCKET 50-255, LICENSE DPR-20
PALISADES PLANT - PROPOSED TECHNICAL
SPECIFICATIONS CHANGE - DIESEL
GENERATOR OPERABILITY

By letter to J. G. Keppler (OIE) from D. A. Bixel dated May 25, 1976, we reported an event relating to the operation of the diesel generator with one high-pressure safety injection (HPSI) pump out of service. From a review of this event, we have concluded that this operation is permissible but that the Technical Specifications should be clarified to eliminate further confusion on this subject.

The Palisades Plant was designed with one HPSI pump (P66B) on bus 1C and two HPSI pumps (P66A and P66C) on bus 1D. The Final Safety Analysis Report (FSAR) (Section 6) assumes operation of only one HPSI pump. In addition, the FSAR (Section 8, Figure 8-8) shows that following a design basis accident, when the diesel generator is used to supply power, only one pump on bus 1D is started automatically (pump P66A).

The Palisades Technical Specifications, Section 3.3, require that one HPSI pump be operable on each bus for start-up; however, one pump may be inoperable for a limited period of time. This, we conclude, is clearly the specific requirement for operability of the HPSI pumps.

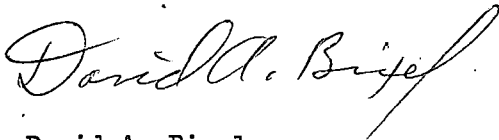
Section 3.7.i of the Palisades Technical Specifications provides for an inoperable diesel generator for a limited period of time provided that "...there are no inoperable engineered safety feature components associated with the operable diesel generator."

We conclude that when a diesel generator is removed from service only the safety equipment required to be operable by other sections of the Technical Specifications and which is started automatically by the DBA sequences need be considered as "components associated with the operable diesel generator."

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The Technical Specification 3.7.2.i is confusing and we, therefore, have attached a proposed Technical Specifications Change which will clarify this specification.

We believe that the above interpretation is correct and will operate our Palisades Plant accordingly.

A handwritten signature in cursive script, reading "David A. Bixel".

David A. Bixel
Assistant Nuclear Licensing Administrator

CC: JGKeppler, USNRC

CONSUMERS POWER COMPANY

Docket No 50-255

Request for Change to the Technical Specifications

License DPR-20

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in Provisional Operating License DPR-20, Docket 50-255, issued to Consumers Power Company on October 16, 1972, be changed as described in Section I below:

I. CHANGES

Change Paragraph 3.7.2.i to read as follows:

"i. One of the diesel generators may be inoperable for up to 7 days (total for both) during any month, provided the other diesel is started to verify operability, shutdown and the controls are left in the automatic mode, and there are no inoperable engineered safety feature components (that are required by other sections of these Technical Specifications) associated with the operable diesel generator."

II. DISCUSSION

The proposed change is made to clarify the intent of this specification. For further discussion, see the transmittal letter.

III. CONCLUSIONS

Based on the foregoing, the Palisades Plant Review Committee has concluded that this change does not involve an unreviewed safety question.

CONSUMERS POWER COMPANY



C. R. Bilby, Vice President

Sworn and subscribed to before me this 9th day of June 1976.



Linda R. Thayer, Notary Public
Jackson County, Michigan

My commission expires July 9, 1979.

(SEAL)