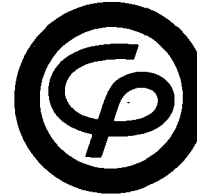


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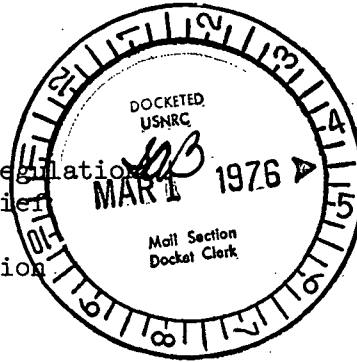


Consumers
Power
Company

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

February 25, 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 - CHARCOAL ADSORBERS
PROPOSED TECHNICAL SPECIFICATIONS CHANGE

The attached proposed Technical Specifications change would delete the requirement for operation of the fuel pool charcoal adsorber after the I-131 level in irradiated fuel has decayed by a factor of 10. The Palisades Technical Specifications presently require charcoal adsorber use whenever irradiated fuel is being handled.

The present Palisades schedule calls for fuel handling to begin in March. This will require needless usage of the charcoal adsorber system and could result in adsorber degradation and/or early replacement of the adsorber.

Your expedited handling of this request would be appreciated.

David A. Bixel
Assistant Nuclear Licensing Administrator

CC: JGKeppler, USNRC

CONSUMERS POWER COMPANY

Docket 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 follows:

I. CHANGES

A. Add new Part C to Section 3.13 (specifications).

"c. The fuel storage building ventilation shall be operating and discharging through the HEPA and charcoal adsorbers during crane operation with loads over the fuel storage pool when irradiated fuel which has decayed less than 30 days is in the spent fuel storage pool."

B. Change Section 3.8.4 to read as follows:

"3.8.4 The ventilation system and charcoal filter in the fuel storage building shall be operating whenever irradiated fuel which has decayed less than 30 days is being handled by either of the following operations:

- a. Refueling operation with the equipment door open, or
- b. Fuel handling in the fuel storage building."

C. Change the basis of Section 3.8.4 by adding the following:

"The fuel handling accident analysis assures that the charcoal adsorbers will perform to remove a minimum of 70% and 90% (organic and inorganic, respectively) iodine activity. Following a period of 30 days, the I-131 will have decayed by a factor of 10 and adsorption by charcoal will no longer be required."

II. DISCUSSION

The fuel handling accident analysis⁽¹⁾ assumes that the charcoal adsorber will perform to remove 70% and 90% (organic and inorganic, respectively) of radioactive iodine and demonstrates that release to the atmosphere is within acceptable limits. Following a decay period of 30 days, the iodine activity levels will be more than a factor of 10 below those assumed in the analysis and use of the charcoal adsorber will not be required to maintain acceptable release levels.

III. CONCLUSION

The Palisades Plant Review Committee has reviewed this proposed change and concluded that it does not involve an unreviewed safety question. Due to time considerations, this change has not been presented before the Safety and Audit Review Board. We will advise you should their review determine the change to be undesirable.

CONSUMERS POWER COMPANY

By

C. R. Bilby
C. R. Bilby, Vice President

Sworn and subscribed to before me this 27th day of February 1976.

Sylvia B. Ball
Notary Public, Jackson County, Michigan
My commission expires May 18, 1976

(1) See Amendment No 21, New Appendix J to the FSAR Titled "Evaluation of Postulated Accidents" and Transmitted by Letters Dated August 9, 1974 and March 11, 1975