unavailable. The ability to safely shut down the operating unit and mitigate the consequences of all accidents previously evaluated will be maintained. The reserve source of off-site power is not relied upon in any design basis accident. Therefore, based on the previous discussion, the proposed changes do not involve a significant increase in consequences of any accident previously evaluated.

2. The proposed amendment does not create the possibility of a new or different kind of accident from any previously analyzed.

The proposed changes to the Technical Specifications do not involve the addition of any new or different types of safety-related equipment, nor does it involve the operation of equipment required for safe operation of the facility in a manner different from those addressed in the safety analysis. No safety related equipment or function will be altered as a result of the proposed changes. Also, the procedures governing normal plant operation and recovery from an accident are not changed by the proposed Technical Specification changes. The proposed changes will extend the allowed outage time for the Reserve source of off-site power, on a onetime basis, to allow the installation of high speed protective relays on the unit system auxiliary transformers which will increase the level of protection from ground faults on the low voltage (secondary) side of the transformers. The addition of the high speed relaying has been evaluated pursuant to 10 CFR 50.59, and no unreviewed safety questions were identified.

Requirements will be modified to require additional assurance that the remaining offsite source of AC power and the on-site source of emergency (emergency diesel generators) are OPERABLE. Since no new failure modes or mechanisms are added by the proposed changes, the possibility of a new or different kind of accident is not created.

3. The proposed changes do not involve a significant reduction in a margin of safety.

The proposed changes will extend the allowed outage time for the reserve source of off-site power, on a one-time basis, to allow for installation of high speed protective relays on the unit system auxiliary transformers which will increase the level of protection from ground faults on the low voltage (secondary) side of the transformers.

During the SAT outage, power to the operating unit (opposite unit) will be provided by the unit SAT and the UAT in the normal configuration. Emergency on-site power will be provided by the two unit specific EDGs (A and B) and the common 'O' diesel generator. Because the accident analyses take no credit for offsite power availability, this temporary degradation will not impact the analysis results.

No safety system setpoints are changed by this proposal. There is no impact on any physical design margins, and no analytical results are affected by this change. The revised surveillance requirements will provide additional assurance that redundant sources of power are maintained operable while the Reserve source of off-site power is unavailable. Based on the above discussion, the ability to safely shut down the operating unit and mitigate the consequences of all accidents previously evaluated will be maintained. Therefore, the margin of safety is not significantly affected.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: Waukegan Public Library, 128 N. County Street, Waukegan, Illinois 60085

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## Consumers Power Company, Docket No. 50-255, Palisades Plant, Van Buren County, Michigan

*Date of amendment request:* October 5, 1994

Description of amendment request: The proposed amendment would (1) revise primary coolant system (PCS) pressure-temperature (P-T) limits. power-operated relief valve (PORV) setting limits, and primary coolant pump starting limits to accommodate reactor vessel fluence for an additional 4 effective full power years (up to 2.192 x 10<sup>19</sup>nvt). The existing P-T limit curves are calculated for a fluence of 1.8 x 1019 could be reached as early as March 1, 1995; (2) require the high pressure safety injection (HPSI) pumps to be "rendered incapable of injection into the PCS" when the PCS is below 300°F, rather than the existing requirement to render both HPSI pumps "inoperable" when the PCS is below 260°F. This change supports the assumption in the P-T limit analyses that HPSI injection would not occur below 300°F: and (3) establish a more restrictive limit on pressurizer heatup rate to achieve consistency between design assumptions and technical specification (TS) limits. The limit in the existing TS is less restrictive than used in design calculations. Neither the design heatup rate nor the TS heatup rate limit is achievable with installed equipment.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

The following evaluation supports the finding that operation of the facility in

accordance with the proposed Technical Specifications would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The revision of the Primary Coolant Pump [PCP] starting limits, PCS P-T curves, and PORV setting limits would not cause any changes to the capability or operation of plant systems that would affect the probability of occurrence or consequences of an accident. These revisions simply update the existing requirements to account for additional reactor vessel fluence.

The reduction of the allowable pressurizer heatup rate would have no effect on operation of the plant. The current limit is physically unobtainable with installed equipment. The proposed change better aligns the Technical Specification limits with the design analysis. The change in the pressurizer heatup rate limit will not increase the probability or consequences of an accident.

Requiring the HPSI pumps to be operable when above 325°F, rather than when above 300°F does not affect the probability or consequences of any accident previously evaluated. Neither the existing 300°F requirement nor the proposed 325°F requirement has an analytical base. This requirement was recently changed from 325°F to 300°F simply for uniformity. With the revised P-T limit analysis requirement to assure that inadvertent HPSI injection will not occur below 300°F, it is necessary to revert to the former limit of 325°F to provide time to transition between these two contrasting HPSI pump requirements.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The revised specifications, PCP starting limits, PCS P-T limits, pressurizer heatup rate, PORV setting limits, and HPSI pump restrictions, all are directly related to, and intended to prevent, a previously analyzed event, failure of the Reactor Coolant Pressure Boundary. Revision of these limits would not create the possibility of a new or different kind of accident.

3. Involve a significant reduction in a margin of safety.

The revised PCP starting limits, PCS P-T limits, and PORV setting limits are calculated using a similar methodology as the limits which they replace. Therefore they provide the same margin of safety.

The revised pressurizer heatup rate reduces the currently allowable limit which is in the direction of increased margin of safety. Since there is no equipment installed which would cause either the existing or the proposed limit to be reached, there will be no change on the operation of the plant equipment. Therefore reducing the limit on the pressurizer heatup rate will not involve a significant reduction in the margin of safety.

Requiring the HPSI pumps to be operable when above 325°F, rather than when above 300°F does not involve a significant reduction in any margin of safety. Neither the existing 300°F requirement nor the proposed