

April 16, 2001

MEMORANDUM TO: John A. Grobe, Director
Division of Reactor Safety
Region III

FROM: Suzanne C. Black, Deputy Director */RA/*
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: TASK INTERFACE AGREEMENT (TIA) REQUEST FOR EVALUATION
OF PALISADES EMERGENCY PLAN SHIFT STAFFING
COMMITMENTS (TIA 2000-014) (TAC NO. MA9863)

By memorandum dated August 24, 2000, Region III issued a TIA requesting that the Office of Nuclear Reactor Regulation (NRR) perform a technical review of the minimum shift staffing commitments contained in the Palisades Emergency Plan. Specifically, the subject TIA requested NRR review of the following question:

Is it acceptable for Palisades to reduce the onshift emergency responders (a chemistry technician, mechanical maintenance technician, electrical maintenance technician, and an inplant health physics technician) below that described in the regulatory guidance of NUREG-0654 on weekends, holidays, and/or third shift?

The NRR staff reviewed the background information provided by Region III in the August 24, 2000, TIA request. We reviewed historical documentation related to the licensee's justification for changing their shift staffing levels, the region's inspections, and related correspondence between Consumers Energy Company (the licensee) and the region. This included the region's letter of February 22, 1991, which reviewed the change in plant staffing and the augmentation guidelines, and concluded that although the changes did downgrade the emergency response capabilities, "the changes were determined to be minimal and therefore are acceptable."

We discussed the issues with various NRR and regional technical staffs who are knowledgeable of chemistry, electrical and mechanical maintenance, and radiation protection processes and procedures for emergency response.

Notwithstanding previous correspondence from the Region to the licensee "accepting" the licensee's shift staffing levels, it appears that the Palisades on-shift emergency response staffing for the positions of Health Physics Technician, Chemistry Technician, Electrical Maintenance Technician, and Mechanical Maintenance Technician during third shift, weekend, and holiday periods does not meet the 10 CFR 50.47(b)(2) requirement that "adequate staffing to provide initial facility accident response in key functional areas is maintained at all times."

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Therefore, an evaluation for the basis for a compliance backfit is being drafted in accordance with guidance provided in NRR Office Letter 901, Revision 1, "Procedures for Managing Plant-Specific Backfits and 10 CFR 50.54(f) Information Requests" as a tool to document our evaluation. This evaluation can later be processed as a compliance backfit, if that is determined to be appropriate.

This closes TAC MA9863. A new TAC will be opened to address the backfit evaluation. We will continue to work closely with your staff in the development of the package. A meeting with the region and licensee may be needed to discuss the details of the licensee's position.

Docket No. 50-255

cc: W. Lanning, RGN-I
B. Mallett, RGN-II
A. Howell, RGN-IV

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