

January 28, 1983

Docket No. 50-255
LS05-83-01-046

Mr. David J. Vandewalle
Nuclear Licensing Administrator
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

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Dear Mr. Vandewalle:

SUBJECT: TECHNICAL SPECIFICATION CHANGES RELATED TO FORMATION OF
THE NUCLEAR ACTIVITIES PLANT ORGANIZATION - PALISADES PLANT

The Commission has issued the enclosed Amendment No. 75 to Provisional Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your application dated November 12, 1982, which supersedes your request dated July 20, 1982.

The amendment (1) approves changes to the Appendix A Technical Specification provisions of Section 6, Administrative Controls, that primarily reflect the addition of a Nuclear Activities Plant Organization, and (2) involves some organizational title changes.

During our review of your submittal we found it necessary to make modifications to your proposed Technical Specifications. We have discussed these modifications with your representative and have mutually agreed upon them. These modifications are reflected in a comparative copy of the proposed technical specifications, which is attached to our related Safety Evaluation enclosed with this letter.

The Notice of Issuance is also enclosed.

Sincerely,

Original signed by

Thomas V. Wambach, Project Manager
Operating Reactors Branch #5
Division of Licensing

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DATE

Mr. David J. Vandewalle

- 2 -

January 28, 1983

Enclosures:

1. Amendment No. 75 to
License No. DPR-20
2. Safety Evaluation
with Comparative Technical
Specifications
3. Notice of Issuance

cc w/enclosures:
See next page

JVW
03-27-83

OFFICE	DL:ORB#5	DL:ORB#5	DELD	DL:ORB#5	DL:ORB#5		
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DATE	01/27/83	01/27/83	01/28/83	01/28/83	01/28/83		

Mr. David J. Vandewalle

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January 28, 1983

cc

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

CONSUMERS POWER COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 75
License No. DPR-20

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Power Company (the licensee) dated November 12, 1982 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; and
 - 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, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B of Provisional Operating License No. DPR-20 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A and B (Environmental Protection Plan) as revised through Amendment No. 75, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION


Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: January 28, 1983

ATTACHMENT TO LICENSE AMENDMENT NO. 75

PROVISIONAL OPERATING LICENSE NO. DPR-20

DOCKET 50-255

Remove Pages

6-1

6-1a

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6-2

6-5 through 6-10

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Insert Pages

6-1*

6-1a*

6-1b

6-2

6-5 through 6-10

6-10a

*The provisions contained on these pages have not been changed;
they are included for pagination purposes only.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Plant General Manager shall be responsible for overall plant operation and shall delegate in writing the succession for this responsibility during his absence.

6.2 ORGANIZATION

6.2.1 OFFSITE

The offsite organization for plant management and technical support shall be as shown on Figure 6.2-1.

6.2.2 PLANT STAFF

The plant organization shall be as shown on Figure 6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up (through 15% power), scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. All core alterations after the initial fuel loading shall either be performed by a licensed Reactor Operator under the general supervision of a Senior Reactor Operator or directly supervised by a licensed Senior Reactor Operator (or Senior Operator limited to Fuel Handling) who has no other concurrent responsibilities during this operation.
- f. A fire brigade of at least 5 members shall be maintained on site at all times.* This excludes 3 members of the minimum shift crew necessary for safe shutdown or any personnel required for other essential functions during a fire emergency.

*Fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours to accommodate unexpected absence of fire brigade members provided immediate action is taken to restore the fire brigade to the minimum requirements.

ADMINISTRATIVE CONTROLS

6.2.3 NUCLEAR ACTIVITIES PLANT ORGANIZATION (NAPO)

6.2.3.1 The NAPO shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety. The organization shall report to the Executive Engineer - NAPO. With the concurrence of the Executive Engineer, NAPO may function as staff to the onsite and offsite review organizations and provide technical support for problem resolution and General Office interface.

COMPOSITION

6.2.3.2 The NAPO shall be composed of members located at other Consumers Power Company Nuclear Power facilities, and at the General Office, and onsite members at the Palisades Plant. The NAPO on site shall consist of a minimum of five (5) technical personnel.¹

QUALIFICATIONS

6.2.3.3 At least three of the full-time members at the Palisades Plant shall have a bachelor's degree in engineering or a related science. At least one of the three shall have a minimum of five years' professional experience which includes a minimum of two years' experience in nuclear power plant operation and/or design. Those individuals comprising the minimum complement of five and not having bachelor's degrees in engineering or a related science shall have at least two years experience in the field for which they will provide expertise to NAPO.

Any NAPO member may be drawn upon to perform NAPO duties on a temporary basis at any nuclear plant location.

REPORTS

6.2.3.4 Reports of NAPO activities shall be submitted regularly to the NSB with copies to PRC.

¹The requirement for a minimum of five (5) technical personnel shall be effective on 1/1/83.

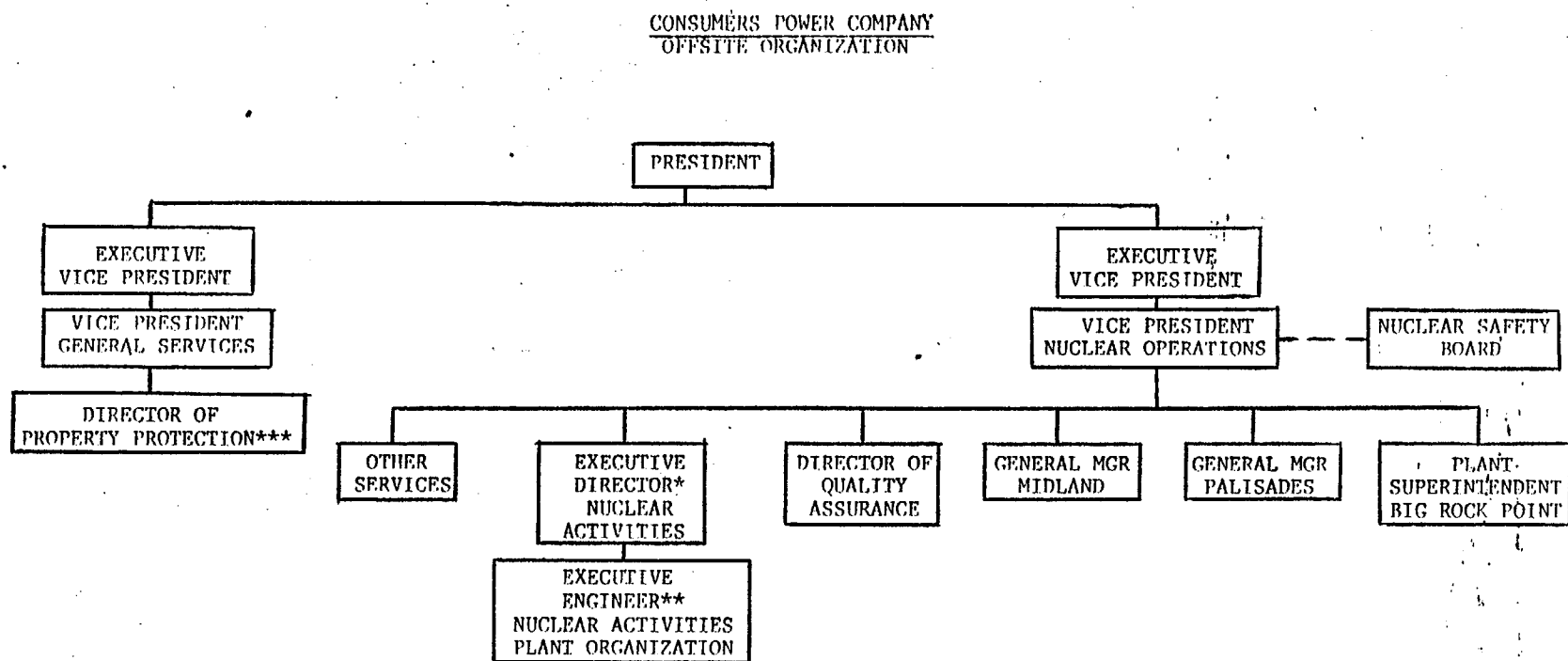
6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.
- 6.3.2 The Health Physicist shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.⁽¹⁾
- 6.3.3 The Shift Technical Advisor (STA) shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Nuclear Training Administrator and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR, Part 55.
- 6.4.2 A training program for the fire brigade shall be maintained under the direction of the Plant Training Coordinator and shall, as practical, meet or exceed the requirements of Section 27 of the NFPA Code.

(1) For the purpose of this section "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following; (a) Formal schooling in science or engineering, or (b) operational or technical experience/training in nuclear power.



*NSB Chairman

**NSB Vice Chairman and Secretary

***Responsible for Overall Fire Protection Program

Figure 6.2-1

5-1-80/1/11

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

FUNCTION

6.5.1.1 The Plant Review Committee (PRC) shall function to advise the Plant General Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PRC shall be composed of:

Chairman: Plant General Manager or Designated Alternate
Member: Technical Superintendent
Member: Maintenance Superintendent
Member: Operations Superintendent
Member: Instrument and Control Engineer
Member: Reactor Engineer
Member: Health Physicist
Member: Shift Supervisor
Member: Chemical Engineer
Member: Technical Engineer or Supervisory Engineer
Member: Shift, Senior or General Engineer

ALTERNATES

6.5.1.3 Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis. However, no more than two alternates shall participate as voting members at any one time in PRC activities.

6.5.1.4 MEETING FREQUENCY

The PRC shall meet at least once per calendar month with special meetings as required.

6.5.1.5 QUORUM

A quorum of the PRC shall consist of the Chairman and four members (including alternates).

6.5.1.6 RESPONSIBILITIES

The PRC shall be responsible for:

- a. Review of: (1) all procedures required by Specification 6.8 and changes thereto and (2) any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.

- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications. (A report shall be prepared covering evaluation and recommendations to prevent recurrence and forwarded to the Vice President-Nuclear Operations and to the Executive Engineer-NAPO.)
- f. Review of plant operations to detect potential nuclear safety hazards.
- g. Performance of special reviews and investigations and reports thereof as requested by the Plant General Manager or Chairman of NSB.
- h. Review of the Site Emergency Plan and implementing procedures.
- i. Review of events requiring 24-hour written notification to the Commission.

6.5.1.7 AUTHORITY

The PRC shall:

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Specifications 6.5.1.6.a. through d. above.
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6.a. through e. above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President-Nuclear Operations and to the Vice Chairman of NSB of any disagreement between the PRC and the Plant General Manager; however, the Plant General Manager shall have responsibility for the resolution of such disagreements pursuant to Specification 6.1.1 above.

RECORDS

6.5.1.8 The PRC shall maintain written minutes of each PRC meeting and shall provide copies to the NSB.

6.5.2 NUCLEAR SAFETY BOARD (NSB)

RESPONSIBILITIES

6.5.2.1 The Nuclear Safety Board (NSB) is responsible for maintaining a continuing examination of nuclear safety-related Corporate and plant activities and defining opportunities for policy changes related to improved nuclear safety performance. The NSB shall operate in accordance with a written charter, approved by the Vice President-Nuclear Operations, which designates the membership, authority, and rules for conducting the meetings.

FUNCTION

6.5.2.2 The NSB shall function to provide review of designated activities in the areas specified in Specification 6.5.2.3.

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.3 The NSB shall consist of members appointed by the Vice President - Nuclear Operations. NSB shall be chaired by the Executive Director of Nuclear Activities, the Vice Chairman or a duly appointed alternate. The Executive Engineer - NAPO, shall be the Vice Chairman and Secretary.

Collectively, personnel appointed for NSB shall be competent to conduct reviews in the following areas:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical and Electrical Engineering
- h. Quality Assurance Practices

An individual appointed to NSB may possess expertise in more than one of the above specialties. These individuals should, in general, have had professional experience in their specialty at or above the Senior Engineer level.

ALTERNATE MEMBERS

6.5.2.4 Alternate members may be appointed in writing by the Vice President-Nuclear Operations to act in place of members during any legitimate and unavoidable absences. The qualifications of alternate members shall be similar to those of members.

CONSULTANTS

6.5.2.5 Consultants shall be utilized as determined by the NSB Chairman or Vice Chairman to provide expert advice to the NSB. NSB members are not restricted as to sources of technical input and may call for separate investigation from any competent source.

MEETING FREQUENCY

6.5.2.6 NSB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once every six months thereafter.

ADMINISTRATIVE CONTROLS

QUORUM

6.5.2.7 A quorum of NSB shall consist of the Chairman and four (4) members. (The Vice Chairman may be a voting member when not acting in the capacity of Chairman.) No more than a minority of the quorum shall have line responsibility for operation of the facility. It is the responsibility of the Chairman to ensure that the quorum convened for a meeting contains appropriately qualified members or has at its disposal consultants sufficient to carry out the review functions required by the meeting agenda.

6.5.2.8 RESPONSIBILITIES

REVIEW

6.5.2.8.1 NSB shall be responsible for the review of:

- a. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- b. All events which are required by regulations or Technical Specifications to be reported to NRC in writing within 24 hours and other violations (of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements or of internal procedures or instructions) having nuclear safety significance.
- c. Issues of safety significance identified by the Plant General Manager, the NSB Chairman, Executive Engineer NAPO or the PRC.
- d. Proposed changes in the operating license or Appendix "A" Technical Specifications.
- e. The results of actions taken to correct deficiencies identified by the audit program specified in Specification 6.5.2.8.2 at least once every six months.
- f. Safety evaluations for changes to procedures, equipment, or systems and tests or experiments completed under the provisions of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question.
- g. Maintain cognizance of PRC activities through NAPO attendance at scheduled PRC meetings or through review of PRC meeting minutes.

AUDITS

6.5.2.8.2 Audits of operational nuclear safety-related facility activities shall be performed under the cognizance of NSB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.

ADMINISTRATIVE CONTROLS

- c. The performance of activities required by the operational quality assurance program (CPC-2A QAPD) to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- d. The Site Emergency Plan and implementing procedures at least once per 12 months.
- e. The Site Security Plan and implementing procedures (as required by the Site Security Plan) at least once per 12 months.
- f. Any other area of plant operation considered appropriate by NSB or the Vice President-Nuclear Operations.
- g. The plant Fire Protection Program and implementing procedures at least once per 24 months.
- h. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

Audit reports encompassed by Specification 6.5.2.8.2 above shall be forwarded to the NSB Vice Chairman and Secretary, and Management positions responsible for the areas audited within thirty (30) days after completion of the audit.

AUTHORITY

6.5.2.9 The NSB Chairman shall report to and advise the Vice President - Nuclear Operations of significant findings associated with NSB activities and of recommendations related to improving plant nuclear safety performance.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.10 Records of NSB activities shall be prepared and distributed as indicated below:

- a. Minutes of each NSB meeting shall be prepared and forwarded to the Vice President - Nuclear Operations and each NSB member within approximately two weeks following the meeting.
- b. If not included in NSB meeting minutes, reports of reviews encompassed by Specification 6.5.2.8.1 shall be prepared and forwarded to the Vice President - Nuclear Operations within approximately two weeks following completion of the review.

6.6 (Deleted)

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

- a. The reactor shall be shut down immediately and not restarted until the Commission authorizes resumption of operation (10 CFR 50.36(c)(1)(i)(A)).
- b. The safety limit violation shall be reported within 1 hour to the Commission in accordance with 10 CFR 50.36, as well as to the Vice President-Nuclear Operations and to the Chairman - NSB.
- c. A report shall be prepared in accordance with 10 CFR 50.36 and 6.9 of this specification. (The safety limit violation and the report shall be reviewed by the PRC.)
- d. The report shall be submitted within 14 days to the Commission (in accordance with the requirements of 10 CFR 50.36), to the Vice President - Nuclear Operations and to the Chairman - NSB.

6.8. PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 Quality Assurance Program Requirements, as endorsed by CPC-2A QAPD.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.

ADMINISTRATIVE CONTROLS

- d. Site Security Plan implementation.
- e. Site Emergency Plan implementation.
- f. Site Fire Protection Program implementation.

6.8.2 PRC is responsible for the review of each procedure of 6.8.1 above, and changes thereto (except for Security Implementing Procedures which are reviewed and approved in accordance with the Site Security Plan). The Plant General Manager shall approve such procedures and changes prior to implementation.

6.8.3 Temporary changes to procedures of Specification 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members (or designated alternates) of the PRC, at least one of whom holds a Senior Reactor Operator's License.
- c. The change is documented, reviewed by the PRC at the next regularly scheduled meeting and approved by the Plant General Manager.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 75 TO PROVISIONAL OPERATING LICENSE NO. DPR-20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated November 12, 1982, Consumers Power Company (the licensee) (CPC) submitted an application for changes to the Appendix A Technical Specifications appended to License No. DPR-20, which authorizes CPC to operate the Palisades Plant. The proposed changes to Section 6, Administrative Controls, pertain to CPC's approach to coordinated company-wide safety management for Palisades, Big Rock Point and Midland Plants. The request supersedes the licensee's July 20, 1982 application.

The licensee's application dated December 20, 1982 requesting Section 6 changes will be handled by a separate license action and evaluation.

2.0 EVALUATION

Figure 6.2-1. Although the licensee did not mention in its application that changes are to be made in Figure 6.2-1, which shows the off-site organization for plant management and technical support, the proposed Figure 6.2-1 incorporates both position title changes and elimination and addition of positions and organizational units.

- a. The name of the Safety and Audit Review Board has been changed to Nuclear Safety Board. The name change has no safety significance (our evaluation of the changes in functions of the Board is given below) and is, therefore, acceptable.
- b. The executive position directly responsible for nuclear operations has been changed from Vice President - Production and Transmission to Vice President - Nuclear Operations. And the position of Manager of Production - Nuclear, to which the nuclear plant superintendents reported, has been eliminated so that the plant superintendent/manager

would report directly to the Vice President - Nuclear Operations. We consider these changes to be acceptable because contact between the plant superintendent/managers and the responsible corporate executive will be direct, thus, improving communications.

- c. The organizations headed by the Manager of Maintenance and Administrative Services are not shown as such on the proposed Figure 6.2-1. However, in Part VIII of the licensee's letter of July 20, 1982, Figure 3 of the proposed Draft Revision to Consumers Power Company's Quality Assurance Program Description for Operational Nuclear Power Plants shows a Nuclear Training Director and a Nuclear Planning and Administration Director both reporting directly to the Vice President - Nuclear Operations. We consider these changes to be acceptable because, as in b. above, communications will be improved. However, we had no information concerning the deletion from Figure 6.2-1 of the position of the Manager of Maintenance and Administrative Services. In a telephone conversation with the licensee on December 21, 1982, we were informed that the only reason that this position and that of the General Superintendent - Administrative Services were included in Figure 6.2-1 was to show the management chain leading to the Nuclear Training Director. Since, as noted above, the Nuclear Training Director will report directly to the Vice President - Nuclear Operations, there is no longer a need to include the Manager of Maintenance and Administrative Services and the General Superintendent - Administrative Services on the organization chart. We find this to be acceptable.
- d. The position of QA Administrator has been deleted from the proposed Figure 6.2-1. However, the Director of Quality Assurance will continue to report directly to the executive position directly responsible for nuclear operations. The proposed deletion is acceptable because the details of the Quality Assurance organization are not intended to be shown in the Technical Specifications.
- e. The proposed Figure 6.2-1 includes the new positions of Executive Director - Nuclear Activities and the Executive Engineer - Nuclear Activities Plant Organization. These positions are properly shown on Figure 6.2-1 to show the relationship between management and the Review and Audit functions described in proposed Sections 6.2.3 and 6.5. Our evaluation of proposed Sections 6.2.3, 6.5, 6.7, and 6.8 are given below.

Section 6.2.3

This proposed section would establish the Nuclear Activities Plant Organization (NAPO). This organization would include members at each of the Consumers Power Company nuclear power plants (Palisades, Big Rock Point, and Midland) and at the General Office in Jackson, Michigan. The organization will be managed by the Executive Engineer - NAPO who reports to the Vice President - Nuclear Operations through the new position of Executive Director - Nuclear Activities.

NAPO will function as a technical review organization that is independent of plant management. It will examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety. It will also assist the Plant Review Committee and the Nuclear Safety Board in accomplishing their functions. There will be at least five technical NAPO personnel at the Palisades Plant. At least three will have bachelors' degrees in engineering or a related science. Those of the five who do not hold bachelors' degrees will have at least two years of experience in the field for which they will provide expertise to NAPO. The use of non-degreed technical personnel permits the safety review to benefit from the talents of experienced technicians and operators.

The proposed Section 6.2.3 is acceptable as revised by the changes indicated in the comparative copy (Attachment). The licensee agreed orally to these changes in a telephone conversation on December 21, 1982.

Section 6.5.1

Proposed Section 6.5.1.1, 6.5.1.4, and 6.5.1.5 are acceptable because they do not differ from the existing specifications except for changes in position titles.

Section 6.5.1.2 includes the addition of the Technical Engineer or Supervisory Engineer, who are members of the plant staff, as a member of the PRC. This is acceptable since it adds expertise to the PRC. The proposed Section 6.5.1.2 does not include the asterisked note in the existing specification that relates to the possibility that the positions of Operations Superintendent and Maintenance Superintendent may be filled by the same individual. In a telephone conversation on December 21, 1982, the licensee told us that the possibility of such duality no longer exists and, therefore, the asterisked note can be deleted. The licensee further informed us that another Technical Specification change request has been sent to NRC that changes Figure 6.2-2 (the plant organization chart) by changing the title Generating Plant Superintendent -Nuclear to Plant General Manager and by deleting footnote (d) which noted the duality discussed above. These changes are acceptable because they are title changes.

Section 6.5.1.3 is acceptable when changed, in order to be editorially correct, in accordance with the attached comparative copy.

Proposed Section 6.5.1.6 is acceptable as changed in the attached comparative copy. These changes bring the proposed Section 6.5.1.6 into conformance with the existing Section 6.5.1.6. New Section 6.5.1.6.h is in accordance with our Standard Technical Specification. The new 6.5.1.6.e merely changes the titles of the recipients of reports, reflecting the organization changes discussed under Figure 6.2-1 and Section 6.2.3 above. New Section 6.5.1.6.g reflects a title change and the addition of the NSB Chairman as requester of work to be done by PRC. This latter change in 6.5.1.6.g brings the specification into conformance with Standard Specification 6.5.1.6.h.

Specification 6.5.1.7 has not been changed except for title changes and, therefore, is acceptable. It should be noted, however, that the licensee proposed Section 6.5.1.7.c., concerning delegation of activities, be included. However, we find that Section 6.5.1.6 permits delegation of work activities, as inferred from the wording "shall be responsible for" and that incorporating the licensee's proposed subsection C. would be redundant and unnecessary. The proposed Specifications 6.5.1.7.a (i.i.) and (i.i.i.) were combined into 6.5.1.7.b.

With regard to proposed Section 6.5.1.8, the licensee proposes to delete the Vice President - Nuclear Operations from distribution for PRC meeting minutes, a change from the existing specification and also at variance from our Standard Technical Specification. However, the Nuclear Safety Board will receive the minutes and, as can be seen from proposed Section 6.5.2.1, has the corporate responsibility for safety oversight. Furthermore, proposed Section 6.5.2.9.b. requires the NSB chairman to report to the Vice President - Nuclear Operations significant findings and recommendations. We conclude that this arrangement will provide adequate input to the Vice President for his managerial role.

Section 6.5.2

Proposed Sections 6.5.2.1 (as changed in accordance with the attached comparative copy) through 6.5.2.7 restate, with only some insignificant changes in position titles or wording, the same matters covered by existing Sections 6.5.2.1 through 6.5.2.6 and are, therefore, acceptable.

Proposed Section 6.5.2.8 sets forth the responsibilities of the Nuclear Safety Board. As revised in accordance with the attached comparative copy, Section 6.5.2.8.1 includes all the review requirements of existing specification 6.5.2.7 except for 6.5.2.7.a, which has required the corporate review board to review "Proposed test or changes to procedures, equipment, systems which are deemed to involve an unreviewed safety question as defined in 10 CFR 50.59." The licensee explained its rationale for deleting this requirement in a telephone conversation on December 21, 1982:

If a matter has been deemed to involve an unreviewed safety question, the licensee cannot implement that matter without NRC approval. Since the wording of this specification implies that the determination had been made by someone other than the corporate review group, there is no need for the corporate review group to review it.

We concur with the licensee's rationale and find that deletion of existing specification 6.5.2.7a is acceptable.

Specification 6.5.2.8.1c has been added in order to complete the licensee's formulation of other matters that the NSB must consider. We find this acceptable.

Specification 6.5.2.8.1.f is slightly different from existing specification 6.5.2.7.e in that the new specification does not require NSB review of "reports and meeting minutes of the PRC." However, we

added a new specification 6.5.2.8.1.g to cover this matter. The licensee expects a member of NAPO to attend all scheduled meetings of the PRC, and will report to the NSB through the Executive Engineer and Executive Director, who are the NSB vice chairman and chairman, respectively. For those PRC meetings not attended by a member of NAPO, the NSB will review the PRC meeting minutes. In this manner, the NSB's work load can be reduced without a significant reduction in NSB overview of PRC activities. We are aware that administrative requirements have burdened safety review groups to a degree that their primary concern with safety may be compromised. This consideration also forms the basis for not requiring the NSB to perform all the detailed work that may be involved in accomplishing its assigned functions. That is, it may be assisted by NAPO or others. Therefore, we find the licensee's proposals concerning NSB review of PRC meeting minutes and having the NSB responsible for the reviews of specification 6.5.2.8.1 (rather than performing the actual reviews itself) to be acceptable.

As with most facilities, audits at Palisades will be performed as part of the quality assurance program, as detailed in the QA program plan. In the case of Palisades, this plan is identified in specification 6.5.2.8.2.c, and has been approved by NRC. Therefore, the Standard Technical Specification requirement for audits to encompass "the results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety..." will be satisfied by the proposed specification 6.5.2.8.1. e. Furthermore, this proposed specification is identical to a previously approved Technical Specification for the licensee's Big Rock Point plant. Proposed specifications 6.5.2.8.2. a, b, c, d, f, g, h and i are the same as our Standard Technical Specifications, and specification 6.5.2.8.2.e is the same as the existing specification. Therefore, all specifications of 6.5.2.8.2 are acceptable.

Section 6.5.2.8.2 has been augmented by the inclusion therein of existing Specification 6.5.2.10.c, and that specification has been deleted from Section 6.5.2.10. This is merely an editorial change and is, therefore, acceptable.

Proposed specification 6.5.2.9. is acceptable as changed in the attached comparative copy. The proposed 6.5.2.9.a and c are not needed and are not in accordance with our Standard Technical Specifications. They have not, therefore, been included in this change.

Proposed specifications 6.5.2.10.a and b are acceptable as changed in the attached comparative copy; they are the same as the existing specifications except for inconsequential title changes. Existing specifications 6.5.2.10.c is now included in specification 6.5.2.8.2.

Section 6.7

Proposed specification 6.7.1.d allows 14 days for submittal of reports to the NRC. This is in accordance with our Standard Technical Specifications and is, therefore, acceptable. Proposed specifications 6.7.1.a through c are unchanged, except for title changes from the existing specifications.

Section 6.8

Except for specification 6.8.1 a, all proposed specifications in 6.8.1, 6.8.2, and 6.8.3 are the same as the existing specifications or the Standard Technical Specifications and are, therefore, acceptable. Proposed specification 6.8.1.a includes "as endorsed by CPC-2A QAPD" to permit, if necessary, exceptions to be taken to Appendix A of Regulatory Guide 1.33 without requiring a change in Technical Specifications. Such exceptions would be reflected in a change to the quality assurance program description (CPC-2A) which would require NRC approval prior to implementation. NRC control over the application of Regulatory Guide 1.33 would not be reduced. Therefore, this proposed specification is acceptable.

Existing specification 6.8.4 has been deleted from proposed Section 6.8. However, its requirements are encompassed by proposed specifications 6.8.1.d and 6.8.2. Therefore, its deletion from Section 6.8 is acceptable.

The licensee has orally agreed to our modifying its proposed technical specifications, as presented in the attached comparative copy. Our reasons for eliminating 6.5.1.7.c are given in our discussion of that specification, and these reasons apply equally to proposed specification 6.5.2.9.c.

3.0 SUMMARY

The proposed changes to the Technical Specifications would primarily incorporate the responsibilities of the newly formed Nuclear Activities Plant Organization which would supplement on-site and off-site safety review and audit committees. The attendant re-arrangement of duties among the review organizations will produce a coordinated, company-wide safety management program. Similar Technical Specifications are proposed for the licensee's Big Rock Point Plant, and Midland Plant. There are also some title changes for the Plant and Corporate Organizations. Other editorial changes are made to make the specifications for Palisades more consistent with the Standard Technical Specifications being issued for new plants. We find, as documented in Section 2.0, that these Technical Specifications, as modified during our review process, are acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the

probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant hazards consideration; (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 ACKNOWLEDGEMENT

R. Benedict contributed to this evaluation

Attachment: Comparative Copy
(Proposed Technical)

Date: January 28, 1983

RE: CPC Application dated 11/12/82.

COMPARATIVE*
OF NRC'S RECOMMENDED
MODIFICATIONS, AS AGREED TO BY LICENSEE

*Note that additions are identified by underlining of the information that has been added and deletions are identified by striking through the information to be deleted.

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 the Provisional Operating License DPR-20, Docket 50-255, issued to Consumers Power Company on October 16, 1972, for the Palisades Plant be changed as described in Section I below:

I. CHANGES

- A. Add Section 6.2.3
- B. Revise Sections 6.5, 6.7 and 6.8
- C. Delete Section 6.8.4

Revised Technical Specifications pages are attached as Section II. Proposed changes are shown by a vertical line in the right-hand margin.

II. DISCUSSION

Consumers Power Company intends to implement a coordinated approach to the safety review function. The plan encompasses NUREG-0737, Item I.B.1.2, "Independent Safety Engineering Group" as well as the onsite and offsite review committees required by the Technical Specifications.

Consumers Power Company was motivated to re-evaluate its safety review policy by three principal factors. First was the the Regulatory Improvement Program currently underway at Palisades, second was a perception of a significant increase in workload for the offsite review board associated with Midland, and last was a study conducted by MAC. The MAC study found, among other comments, that the Plant Review Committees' carried an extremely high workload, and that required supplemental reviews caused this workload to cascade throughout the review process. This high workload and the composition of the review committees (Senior Line Managers) has the potential to detract from the quality of safety reviews and/or the effectiveness of plant management.

The proposed new scheme involves significant changes to the Administrative Controls Section of each of the plant's Technical Specifications. These particular sections of the Technical Specifications are nearly identical for all three plants. Some differences, however, do exist.

The new organizational structure involves the creation of a new department titled "Nuclear Activities Plant Organization" (NAPO) headed by an Executive Engineer. The Company safety review organization also includes the Nuclear Safety Board (NSB) as the offsite review committee and a Plant Review Committee (PRC) at each plant.

The NAPO will report to the Vice President-NOD through the Executive Director, Nuclear Activities. It consists of the Executive Engineer and supporting staff at the General Office and staff at Palisades and Midland. NAPO support for Big Rock Point will be through a small onsite staff or from other parts of the NAPO. The intention of this organization is to permit the NAPO staff on site to act as a technical resource to the PRC by performing safety reviews and assisting PRC in completing other PRC responsibilities. (Concurrence of the Executive Engineer - NAPO is required as detailed in the proposed Technical Specifications.) This organization will also perform independent safety appraisals, trend plant performance and generally perform those functions described in NUREG-0737, Item I.B.1.2. This organization reports off site and is therefore independent of direct line responsibility for operating the plant although total independence from operating pressures is recognized to be difficult to attain.

The NAPO staff will also serve as a technical resource to the NSB. Since NAPO will be a single entity, individuals with specific experience/qualification levels will be available to support NSB reviews at all plants regardless of their permanent "home" location.

Providing this resource for PRC and NSB serves two purposes. First, it elevates the review committees from a level of issue identifiers to one of issue resolvers. Key safety issues can thus be addressed more effectively, better utilizing the talents of the senior and experienced managers who serve on these committees. Secondly, the full-time availability of NAPO will permit safety reviews to be conducted in more detail than is possible using part-time PRC and NSB members.

Specific issues not addressed above include:

- A. ~~Control of NAPO activities will be exercised by the NSB.~~ NAPO will be expected to report to the NSB at regular intervals (approximately quarterly) regarding ongoing safety evaluations, problems identified, etc.
- B. As stated in Section 6.5.1.7, the PRC organization is required to make determinations and recommendations of items considered under 6.5.1.6, a through e, with regard to the issues stated. The PRC, however, may utilize reviews conducted by NAPO or any other technical resource.
- C. Independence from plant management will be fostered by development of career paths not dependent on plant management experience, and by personnel selection.
- D. The requirement of a five member onsite NAPO staff is not effective until January 1, 1983. At the present time the onsite NAPO consists of three members whose qualifications meet the requirements of Section 6.2.3.3.

- E. The requirements of 10 CFR 50.54(t) for an independent review of the emergency preparedness program at least every 12 months (Generic Letter 82-17) are addressed under Item d, Section 6.5.2.8.2.

III. CONCLUSION

Based on the foregoing, both the Palisades Plant Review Committee and the Safety and Audit Review Board have concluded that these changes do not involve an unreviewed safety question.

CONSUMERS POWER COMPANY

J W Reynolds (Signed)

By

J W Reynolds, Executive Vice President
Energy Supply

Sworn and subscribed to before me this 12th day of November 1982.

Helen I Dempski (Signed)

(SEAL)

Helen I Dempski, Notary Public
Jackson County, Michigan

My commission expires December 14, 1983.

SECTION II

CONSUMERS POWER COMPANY
PALISADES PLANT

. PROPOSED PALISADES
TECHNICAL SPECIFICATIONS PAGES

November 5, 1982

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ADMINISTRATIVE CONTROLS

6.2.3 NUCLEAR ACTIVITIES PLANT ORGANIZATION (NAPO)

FUNCTION

6.2.3.1 The NAPO shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety. The organization shall report to the Executive Engineer - NAPO. With the concurrence of the Executive Engineer, NAPO may function as staff to the onsite and offsite review organizations and provide technical support for problem resolution and General Office interface.

COMPOSITION

6.2.3.2 The NAPO shall be composed of members located at other Consumers Power Company nuclear power facilities and at the General Office, and onsite members at the Palisades Plant.¹ The NAPO on site shall consist of a minimum of five (5) technical personnel.¹

QUALIFICATIONS

6.2.3.3 At least three of the full-time members at the Palisades Plant shall each have a bachelor's degree in engineering or a related science. At least one of the three shall have a minimum of five years' professional experience which includes a minimum of two years' experience in nuclear power plant operation and/or design. Those individuals comprising the minimum complement of five and not having bachelor's degrees in engineering or a related science shall have at least two years experience in the field for which they will provide expertise to NAPO.

Any NAPO member may be drawn upon to perform NAPO duties on a temporary basis at any nuclear plant location.

REPORTS

6.2.3.4 Regular Reports of NAPO activities shall be submitted regularly to the NSB with copies to PRC.

6.3 PLANT STAFF QUALIFICATIONS

6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.

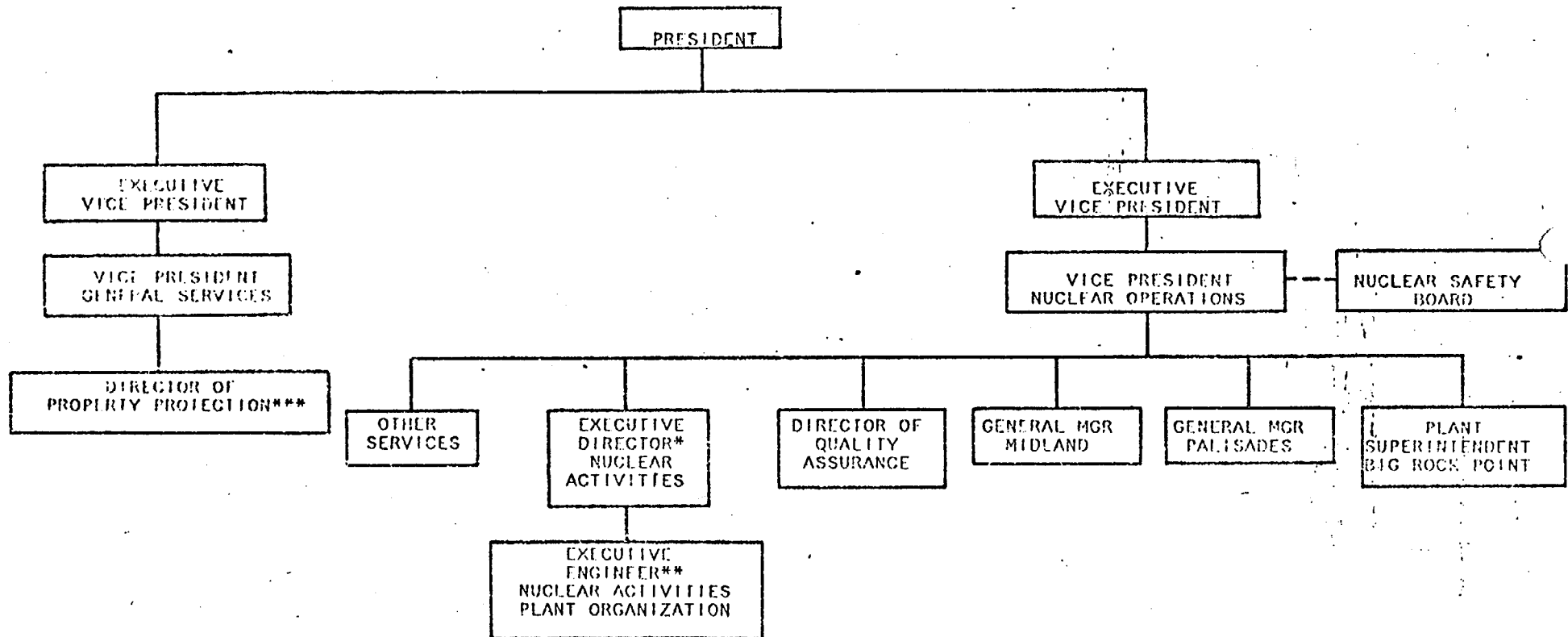
6.3.2 The Plant Health Physicist shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.²

6.3.3 The Shift Technical Advisor/Shift Engineer (STA/SE) shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and/or operations, and response and analysis of the plant for transients and accidents.

¹The requirement for a minimum of five (5) technical personnel shall be effective on 1/1/83.

²For the purpose of this section, "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) Formal schooling in science or engineering, or (b) operational or technical experience/training in nuclear power.

CONSUMERS POWER COMPANY
OFFSITE ORGANIZATION



*NSB Chairman

**NSB Vice Chairman and Secretary

***Responsible for Overall Fire Protection Program

Figure 6.2-1

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Director of Nuclear Operations Training, and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR.

6.4.2 The Director of Property Protection is responsible for the development, revision, approval and implementation of the Fire Brigade training program. This training shall, as practicable, meet or exceed the requirements of Section 27 of the NFPA Code-1975. Fire-Brigade training drills shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

FUNCTION

6.5.1.1 The Plant Review Committee (PRC) shall function to advise the Plant General Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2

The PRC shall be composed of:

Chairman: Plant General Manager or Designated Alternate
Member: Technical Superintendent
Member: Maintenance Superintendent
Member: Operations Superintendent
Member: Instrument and Control Engineer
Member: Reactor Engineer
Member: Health Physicist
Member: Shift Supervisor
Member: Chemical Engineer
Member: Technical Engineer or Supervisory Engineer
Member: Shift, Senior or General Engineer

ALTERNATES

6.5.1.3 Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis. However, no more than two alternates shall participate as voting members at any one time in PRC activities.

MEETING FREQUENCY

6.5.1.4 The PRC shall meet at least once per calendar month, with special meetings as required.

ADMINISTRATIVE CONTROLS

QUORUM

6.5.1.5 A quorum for PRC shall consist of the Chairman and four (4) voting members.

RESPONSIBILITIES

6.5.1.6 The PRC shall be responsible for:

- a. Review of: (1) all procedures required by Specification 6.8.2 and changes thereto and (2) any other proposed procedures or changes thereto as determined by the ~~PRG-Chairman~~ Plant Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety ~~and changes to procedures as described in the Final Safety Analysis Report.~~
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant, systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications. (A report shall be prepared covering evaluation and recommendations to prevent recurrence and forwarded to the Vice President - Nuclear Operations and to the Executive Engineer - NAPO.)
- f. Review of plant operations to detect potential nuclear safety hazards.
- g. Performance of special reviews and investigations and reports thereof as requested by the Plant General Manager or Chairman of NSB.
- h. Review of the Site Emergency Plan and implementing procedures.
- i. Review of events requiring 24-hour written notification to the Commission.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.1.7 ~~Authority of PRC is as follows:~~

~~a. The PRC shall:~~

- a. (i) Recommend in writing to the Plant General Manager approval or disapproval of items considered under Specifications 6.5.1.6.a. through d. above.
- b. (ii) Render determinations in writing with regard to whether or not each item considered under Specifications ~~6.5.1.6.b. and d.~~ 6.5.1.6.a. through e. above constitutes an unreviewed safety question.
- ~~(iii) Render determinations in writing with respect to the impact on safety of each item considered under Specifications 6.5.1.6.a., c. and e.~~

~~b. The PRC Chairman shall:~~

- c. (i) Provide written notification within 24 hours to the Vice President - Nuclear Operations and to the Vice Chairman of NSB of any disagreement between the PRC and the Plant General Manager; however, the Plant General Manager shall have responsibility for the resolution of such disagreements pursuant to Specification 6.1.1 above.

- ~~c. The PRC may delegate activities associated with fulfilling its responsibilities under Specification 6.5.1.6. Those activities specified in Specifications 6.5.1.7.a. and b. above, however, may not be delegated.~~

RECORDS

6.5.1.8 The PRC shall maintain written minutes of each PRC meeting and shall ~~maintain records of transactions specified in Specifications 6.5.1.7.b. and c.~~ provide copies to the NSB.

6.5.2 NUCLEAR SAFETY BOARD (NSB)

RESPONSIBILITIES

6.5.2.1 The Nuclear Safety Board (NSB) is responsible for maintaining a continuing examination of nuclear safety-related Corporate and plant activities and defining opportunities for policy changes related to improved nuclear safety performance. The NSB shall operate in accordance with a written charter, approved by the Vice President-Nuclear Operations, which designates the membership, authority, and rules for conducting the meetings.

FUNCTION

6.5.2.2 The NSB shall function to provide review of designated activities in the areas specified in Specification 6.5.2.3.

ADMINISTRATIVE CONTROLS

COMPOSITION

6.5.2.3 The NSB shall consist of members appointed by the Vice President - Nuclear Operations. NSB shall be chaired by the Executive Director of Nuclear Activities, the Vice Chairman or a duly appointed alternate. The Executive Engineer - NAPO, shall be the Vice Chairman and Secretary.

Collectively, personnel appointed for NSB shall be competent to conduct reviews in the following areas:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical and Electrical Engineering
- h. Quality Assurance Practices

An individual appointed to NSB may possess expertise in more than one of the above specialties. These individuals should, in general, have had professional experience in their specialty at or above the Senior Engineer level.

ALTERNATE MEMBERS

6.5.2.4 Alternate members may be appointed in writing by the Vice President - Nuclear Operations to act in place of members during any legitimate and unavoidable absences. The qualifications of alternate members shall be similar to those of members.

CONSULTANTS

6.5.2.5 Consultants shall be utilized as determined by the NSB Chairman or Vice Chairman to provide expert advice to the NSB. NSB members are not restricted as to sources of technical input and may call for separate investigation from any competent source.

MEETING FREQUENCY

6.5.2.6 NSB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once every six months thereafter.

ADMINISTRATIVE CONTROLS

QUORUM

6.5.2.7 A quorum of NSB shall consist of the Chairman and four (4) members. (The Vice Chairman may be a voting member when not acting in the capacity of Chairman.) No more than a minority of the quorum shall have line responsibility for operation of the facility. It is the responsibility of the Chairman to ensure that the quorum convened for a meeting contains appropriately qualified members or has at its disposal consultants sufficient to carry out the review functions required by the meeting agenda.

6.5.2.8 RESPONSIBILITIES

REVIEW

6.5.2.8.1 NSB shall be responsible for the review of:

- a. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- b. All events which are required by regulations or Technical Specifications to be reported to NRC in writing within 24 hours and other violations (of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements or of internal procedures or instructions) having nuclear safety significance.
- c. Issues of safety significance identified by the Plant General Manager, the NSB Chairman, Executive Engineer NAPO or the PRC.
- d. Proposed changes in the operating license or Appendix "A" Technical Specifications.
- e. The results of actions taken to correct deficiencies identified by the audit program specified in Specification 6.5.2.8.2 at least once every six months.
- f. Safety evaluations for changes to procedures, equipment, or systems and tests or experiments completed under the provisions of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question.
- g. Maintain cognizance of PRC activities through NAPO attendance at scheduled PRC meetings or through review of PRC meeting minutes.

AUDITS

6.5.2.8.2 Audits of operational nuclear safety-related facility activities shall be performed under the cognizance of NSB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.

ADMINISTRATIVE CONTROLS

- c. The performance of activities required by the operational quality assurance program (CPC-2A QAPD) to meet the criteria of Appendix "B," 10 CFR 50, at least once per 24 months.
- d. The Site Emergency Plan and implementing procedures at least once per 12 months.
- e. The Site Security Plan and implementing procedures (as required by the Site Security Plan) at least once per 12 months.
- f. Any other area of plant operation considered appropriate by NSB or the Vice President - Nuclear Operations.
- g. The plant Fire Protection Program and implementing procedures at least once per 24 months.
- h. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

Audit reports encompassed by Specification 6.5.2.8.2 above shall be forwarded to the NSB Vice Chairman and Secretary, and Management positions responsible for the areas audited within thirty (30) days after completion of the audit.

AUTHORITY

6.5.2.9 ~~Authority of NSB is as follow:~~

- ~~a. For responsibilities specified in Specifications 6.5.2.8.1 a and b, the NSB shall be convened. In making determinations and recommendations, the NSB may utilize reviews conducted by NAPO.~~
- b. The NSB Chairman shall report to and advise the Vice President - Nuclear Operations of significant findings associated with NSB activities and of recommendations related to improving plant nuclear safety performance.
- ~~c. The NSB may delegate activities associated with fulfilling its responsibilities under Specification 6.5.2.8. Those activities specified in Specification 6.5.2.9 a. above, however, may not be delegated.~~

ADMINISTRATIVE CONTROLS

RECORDS

6.5.2.10 Records of NSB activities shall be prepared and distributed as indicated below:

- a. Minutes of each NSB meeting shall be prepared and forwarded to the Vice President - Nuclear Operations and each NSB member within approximately two weeks following the meeting. ~~Minutes shall be approved at or before the next regularly scheduled meeting following the distribution of the minutes.~~
- b. If not included in NSB meeting minutes, reports of reviews encompassed by Specification 6.5.2.8.1, ~~above~~, shall be prepared and forwarded to the Vice President - Nuclear Operations within approximately two weeks following completion of the review.

6.6 (Deleted)

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

- a. The reactor shall be shut down immediately and not restarted until the Commission authorizes resumption of operation (10 CFR 50.36(c)(1)(i)(A)).
- b. The safety limit violation shall be reported within 1 hour to the Commission in accordance with 10 CFR 50.36, as well as to the Vice President - Nuclear Operations and to the Chairman - NSB.
- c. A report shall be prepared in accordance with 10 CFR 50.36 and 6.9 of this specification. (The safety limit violation and the report shall be reviewed by the PRC.)
- d. The report shall be submitted within 14 days to the Commission (in accordance with the requirements of 10 CFR 50.36), to the Vice President - Nuclear Operations and to the Chairman - NSB.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 Quality Assurance Program Requirements, as endorsed by CPC-2A QAPD.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.

ADMINISTRATIVE CONTROLS

- d. Site Security Plan implementation.
- e. Site Emergency Plan implementation.
- f. Site Fire Protection Program implementation.

6.8.2 PRC is responsible for the review of each procedure of 6.8.1 above, and changes thereto (except for Security Implementing Procedures which are reviewed and approved in accordance with the Site Security Plan). The Plant General Manager shall approve such procedures and changes prior to implementation.

6.8.3 Temporary changes to procedures of Specification 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members (or designated alternates) of the PRC, at least one of whom holds a Senior Reactor Operator's License.
- c. The change is documented, reviewed by the PRC at the next regularly scheduled meeting and approved by the Plant General Manager.

UNITED STATES NUCLEAR REGULATORY COMMISSIONDOCKET NO. 50-255CONSUMERS-POWER COMPANYNOTICE OF ISSUANCE OF AMENDMENT TO PROVISIONAL
OPERATING LICENSE

The U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment No. 75 to Provisional Operating License No. DPR-20, to Consumers Power Company (the licensee), which revised the Technical Specifications for operation of the Palisades Plant (the facility) located in Van Buren County, Michigan. This amendment is effective as of its date of issuance.

The amendment approves changes to the Appendix A Technical Specification provisions of Section 6, Administrative Controls, that primarily reflect the addition of a Nuclear Activities Plant Organization, and reflect some organizational title changes.

The application for amendment complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendment. Prior public notice of this amendment was not required since the amendment does not involve a significant hazards consideration.

- 2 -

The Commission has determined that the issuance of this amendment will not result in any significant environmental impact and that pursuant to 10 CFR §51.5(d)(4) an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with issuance of this amendment.

For further details with respect to this action, see (1) the application for amendment dated November 12, 1982, (2) Amendment No. 75 to License No. DPR-20, and (3) the Commission's related Safety Evaluation. These items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D. C. and at the Kalamazoo Public Library, 315 South Rose Street, Kalamazoo, Michigan 49006. A single copy of items (2) and (3) may be obtained by request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Licensing.

Dated at Bethesda, Maryland, this 28 day of January, 1983.

FOR THE NUCLEAR REGULATORY COMMISSION

Dennis M. Crutchfield
Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing