

August 16, 1989

Docket No. 50-255  
Serial No. PAL-89-008

Mr. Kenneth W. Berry  
Director, Nuclear Licensing  
Consumers Power Company  
1945 West Parnall Road  
Jackson, Michigan 49201

Dear Mr. Berry:

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SUBJECT: AMENDMENT NO. 127 TO PROVISIONAL OPERATING LICENSE NO. DPR-20:  
TS CHANGES REGARDING ADMINISTRATIVE CONTROLS (TAC NO. 69584)

The Commission has issued the enclosed Amendment No. 127 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 September 23, 1988 and supplemented by a letter dated January 16, 1989.

This amendment makes administrative control changes intended to strengthen both the onsite and offsite safety review functions.

A copy of our related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Albert W. De Agazio, Project Manager  
Project Directorate - III-1  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 127 to  
License No. DPR-20
2. Safety Evaluation

cc w/enclosures:  
See next page

LA/PD31:DRSP *MLR*  
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7/27/89  
*Do not convey in TS*

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PM/PD31:DRSP  
MA De Agazio  
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*W. Long*  
(A)D/PD31:DRSP  
for LYandell  
7/28/89

OFFICIAL RECORD COPY

OGC  
*CPW*  
7/31/89

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PDR ADOCK 05000255  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

August 16, 1989

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Serial No. PAL-89-008

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Sincerely,

A handwritten signature in cursive script, reading "Albert W. De Agazio".

Albert W. De Agazio, Project Manager  
Project Directorate - III-1  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 127 to  
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cc w/enclosures:  
See next page

Mr. Kenneth W. Berry  
Consumers Power Company

Palisades Plant

cc:

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

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 127  
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 September 23, 1988 and supplemented by a letter dated January 16, 1989, 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.

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P PNU

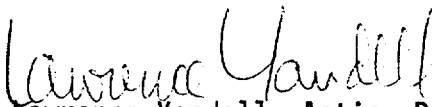
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 3.B. of Provisional Operating License No. DPR-20 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 127, 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 and shall be implemented not later than September 30, 1989.

FOR THE NUCLEAR REGULATORY COMMISSION



Lawrence Yandell, Acting Director  
Project Directorate - III-1  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: August 16, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 127

PROVISIONAL OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

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PALISADES PLANT TECHNICAL SPECIFICATIONS  
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## ADMINISTRATIVE CONTROLS

### 6.2.2 PLANT STAFF (Continued)

- f. Administrative procedures shall limit the working hours of Plant staff who perform safety-related functions.

In the event that overtime is used, the following guidelines shall be followed:

- A. An individual shall not be permitted to work more than 16 hours straight (excluding shift turnover time).
- B. An individual shall not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any seven-day period (all excluding shift turnover time).
- C. A break of at least eight hours shall be allowed between work periods (including shift turnover time).
- D. Except during extended shutdown periods the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Deviations from the overtime guidelines shall be authorized by the Plant General Manager or his Alternate. The basis for granting the deviation shall be documented. Routine deviations are not to be authorized.

Individual overtime will be reviewed monthly by the Plant General Manager or his designee to assure that excessive hours have not been assigned.

### 6.2.3 (DELETED)

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6.2.3.2 (Continued)

(DELETED)

### 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 Physics Superintendent shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.\*

6.3.3 The Shift Technical Advisor shall have a bachelor's degree or equivalent and the Shift Engineer shall have a bachelor's degree 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. The Shift Engineer shall hold a Senior Operator License.

6.3.4 The Plant Safety and Licensing staff who perform the reviews specified in 6.5.3 shall meet or exceed the minimum qualifications of ANS 3.1 - 1987, Section 4.7.1 and 4.7.2. A Senior Reactor Operator License or certification shall be considered equivalent to a bachelors degree for the purpose of this specification for no more than two individuals.

\*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.

6.4        TRAINING

6.4.1       A retraining and replacement training program for the plant staff shall be maintained under the direction of the Executive Director of Energy Supply Planning, Training and Administration, 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       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)

6.5.1.1     FUNCTION

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

6.5.1.2     COMPOSITION

The PRC shall be composed of:

Chairman:	Plant General Manager	/
Member:	Operations Manager*	
Member:	Engineering and Maintenance Manager*	
Member:	Radiological Services Manager*	
Member:	Plant Safety and Licensing Director*	/
Member:	Reactor Engineering Superintendent	
Member:	Operations Superintendent	
Member:	Instrumentation and Control Superintendent	
Member:	Shift Supervisor or Shift Engineer(s)(1)	

\*may serve as Designated Alternate for the Chairman

6.5.1.3     ALTERNATES

Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis. No more than two alternates shall participate as voting members at any one time in PRC activities. Members identified with a asterisk (\*) above may function as the Designated Alternate for the Chairman, and in so doing, are not considered alternate members for voting purposes.

## ADMINISTRATIVE CONTROLS

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### 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 nuclear safety review of: /

- a. All procedures and programs specified by Specification 6.8 and changes thereto, and any other procedures or changes thereto as determined by the Plant General Manager to affect nuclear safety; all proposed tests or experiments that affect nuclear safety; all proposed changes or modifications to plant systems or equipment that affect nuclear safety; and the Site Emergency Plan. /
- b. All proposed changes to Operating License and Technical Specifications. /
- c. Results of investigations of all violations of the Technical Specifications. (A report shall be prepared covering evaluation and recommendations to prevent recurrence and be forwarded to the Vice President - NOD and Nuclear Safety Service Department (NSSD).) /
- d. Plant operations to detect potential safety hazards. /
- e. Reports of special reviews and investigations as requested by the Plant General Manager or NSSD. /
- f. All reportable events as defined in Section 1.4. /
- g. All items identified under Specification 6.5.3.4 as significant to nuclear safety. /
- h. Monthly reports from Plant Safety and Licensing. /

PRC review of the above items may be performed by routing, subject to the requirements of Specification 6.5.1.7. PRC may delegate review of item a. to Plant Safety and Licensing as described in Specification 6.5.3 /

## ADMINISTRATIVE CONTROLS

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### 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 h. above. /
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6.a, b, c and g above constitutes an unreviewed safety question. /
- c. Provide written notification within 24 hours to the Vice President - Nuclear Operations and to the Nuclear Safety Services Department of any disagreements 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. /

The PRC Chairman may recommend to the Plant General Manager approval of those items identified in Specification 6.5.1.6 above based on a routing review provided the following conditions are met: (1) at least five PRC members including the Chairman and no more than 2 alternates, shall review the item, concur with determination as to whether or not the item constitutes an unreviewed safety question, and provide written comments on the item; (2) all comments shall be resolved to the satisfaction of the reviewers providing the comments; and (3) if the PRC Chairman determines that the comments are significant, the item (including comments and resolutions) shall be recirculated to all reviewers for additional comments. /

The item shall be reviewed at a PRC meeting in the event that: (1) comments are not resolved; or (2) the Plant General Manager overrides the recommendations of the PRC; or (3) a proposed change to the Technical Specifications involves a safety limit, a limiting safety system setting or a limiting condition for operation; or (4) the item was reportable to the NRC.

### 6.5.1.8 RECORDS

The PRC shall maintain written minutes of each PRC meeting and shall provide copies to the NSSD. /

6.5.2 NUCLEAR SAFETY SERVICES DEPARTMENT (NSSD)

6.5.2.1 FUNCTION

The Nuclear Safety Services Department (NSSD) shall function to provide independent review of activities in the areas of:

- a. Nuclear power plant operation
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical and electrical engineering
- i. Administrative controls and quality assurance practices
- j. Emergency Planning
- k. Training

6.5.2.2 COMPOSITION

The NSSD shall consist of a full-time staff appointed by and reporting to the Vice President - NOD. NSSD staff shall have no direct responsibility for activities subject to their review.

The NSSD staff shall meet or exceed the qualifications described in Section 4.7 of ANSI/ANS 3.1 - 1987.

6.5.2.3 CONSULTANTS

If sufficient expertise is not available within NSSD to review particular issues, the NSSD shall have the authority to utilize consultants or other qualified organizations for expert advice.

6.5.2.4 RESPONSIBILITIES

6.5.2.4.1 REVIEW

The NSSD shall review:

- a. The safety evaluations for: 1) changes to procedures, equipment or systems, and 2) tests or experiments completed under the provisions of 10 CFR 50.59 to verify that such actions do not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.

6.5.2.4.1 REVIEW (Continued) /

- c. Proposed tests or experiments which involve an  
unreviewed safety question as defined in 10 CFR 50.59. /
- d. Proposed changes to Technical Specifications or the  
Operating License. /
- e. Violations of codes, regulations, orders, Technical  
Specifications, license requirements, or of internal  
procedures or instructions having nuclear safety  
significance. /
- f. Significant operating abnormalities or deviations from  
normal and expected performance of unit equipment that  
affects nuclear safety. /
- g. All reportable events having nuclear safety significance. /
- h. All recognized indications of an unanticipated deficiency  
in some aspect of design or operation of structures,  
systems, or components that could affect nuclear safety. /
- i. Reports and meeting minutes of the Plant Review Committee. /

6.5.2.4.2 AUDITS /

Audits of operational nuclear safety-related facility  
activities shall be performed under the cognizance of NSSD. /  
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.
- c. The performance of activities required by the Quality  
Assurance Program Description for Operational Nuclear  
Power Plants (CPC-2A) to meet the criteria of 10 CFR 50,  
Appendix B 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. /

## ADMINISTRATIVE CONTROLS

### 6.5.2.4.2 AUDITS (Continued)

- f. Any other area of plant operation considered appropriate by NSSD 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 to 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 to be performed by an outside qualified fire consultant at intervals no greater than 3 years. /
- j. Radiological environmental monitoring program and the results thereof at least once per 12 months. /
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months. /
- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months. /

Audit reports encompassed by Specification 6.5.2.4.2 above shall be forwarded to the NSSD, and Management positions responsible for the areas audited within thirty (30) days after completion of the audit. /

- 6.5.2.4.3 NSSD review of the subjects in Specifications 6.5.2.4.1 and 6.5.2.4.2 shall be carried out by an assigned lead reviewer selected on the basis of his technical expertise relative to the subject being reviewed. A second-level review shall also be performed. If either the lead reviewer or second-level reviewer determines the need for interdisciplinary review, additional reviewers shall be assigned. /

### 6.5.2.5 AUTHORITY

The NSSD shall report to and advise the Vice President - NOD of significant findings associated with those areas of responsibility specified in Sections 6.5.2.4.1 and Section 6.5.2.4.2. /



6.5.2.6 RECORDS

Records of NSSD activities shall be maintained. Reports shall be prepared and distributed as indicated below: /

- a. The results of reviews, performed pursuant to Section 6.5.2.4.1 and Section 6.5.2.4.2, shall be reported to the Vice President - NOD at least monthly. /
- b. A report assessing the overall nuclear safety performance of Palisades shall be provided to senior Consumers Power Company management annually. /

6.5.3 PLANT SAFETY AND LICENSING /6.5.3.1 FUNCTION /

The Plant Safety and Licensing organization shall function to examine industry operating experience and proposed changes in design or operation to identify issues significant to nuclear safety and recommend nuclear safety improvements. /

6.5.3.2 COMPOSITION /

The Plant Safety and Licensing staff shall be composed of at least five experienced technical staff, reporting to the Plant Safety and Licensing Director, to carry out these functions. /

6.5.3.3 RESPONSIBILITIES /

The Plant Safety and Licensing staff may provide nuclear safety review as delegated by PRC for: /

- a. Procedures, programs and changes thereto identified in Specification 6.8 and any additional procedures and changes thereto identified by the Plant General Manager as significant to nuclear safety. /
- b. All proposed tests or experiments. /
- c. All proposed changes or modifications to plant systems or equipment. /
- d. The Site Emergency Plan. /

## ADMINISTRATIVE CONTROLS

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### 6.5.3.4 AUTHORITY /

The Plant Safety and Licensing staff shall determine those /  
issues significant to nuclear safety which require review by /  
the Plant Review Committee from items considered under /  
Specification 6.5.3.3.a through d. For those items not /  
referred to PRC, Plant Safety and Licensing shall recommend /  
in writing to plant management approval or disapproval /  
of items considered under 6.5.3.3. /

### 6.5.3.5 RECORDS

Reports of Plant Safety and Licensing activities pursuant to /  
Specification 6.5.3.3 shall be submitted monthly to PRC. /

### 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 NSSD. /
- 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 NSSD. /

## ADMINISTRATIVE CONTROLS

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### 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.
  - d. Site Security Plan implementation.
  - e. Site Emergency Plan implementation.
  - f. Site Fire Protection Program implementation.
- 6.8.2 Procedures and changes shall be approved prior to implementation by the appropriate\* senior department manager predesignated by the Plant General Manager subject to the reviews per Specifications 6.5.1.6 and 6.5.3. /
- 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 License.
  - c. The change is documented, subsequently reviewed by Plant Safety and Licensing within 30 days of issuance and approved by the appropriate\* senior department manager predesignated by the Plant General Manager. /

\*The determination of the appropriate senior department manager is based on the activities addressed by the specific procedure and will be predesignated in writing by the Plant General Manager. /



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 127 TO PROVISIONAL OPERATING LICENSE NO. DPR-20  
CONSUMERS POWER COMPANY  
PALISADES PLANT  
DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated September 23 1988, and revised by letter dated January 16, 1989, Consumers Power Company requested changes to the Administrative Controls Section of the Technical Specifications for the Palisades Nuclear Power Plant. The changes are intended to strengthen both onsite and offsite safety review functions.

2.0 EVALUATION

The following is a brief description and evaluation of each requested change to the Technical Specifications.

A. Section 6.2.3 - Plant Safety Engineering (PSE)

Consumers Power Company has deleted this organizational unit in its entirety. The PSE was established to perform the same basic function as an Independent Safety Engineering Group (ISEG). The ISEG is required by the NRC for post-TMI licensed plants. Palisades Nuclear Plant was licensed prior to the accident at TMI, and the NRC has not required Consumers Power Company to have an ISEG at Palisades for any other reason. Therefore, the PSE is not required at the Palisades Nuclear Station.

Based on the above, we find the requested change acceptable.

B. Section 6.5.1- Plant Review Committee (PRC)

1. Section 6.5.1.2 - The composition of the PRC has been revised. The positions of Technical Engineer and Technical Director have been deleted and the positions of Plant General Manager and Plant Safety and Licensing Director; respectively, have been added in their place.
2. Section 6.5.1.6 - This section has been revised to state that "the PRC shall be responsible for nuclear safety review of" in place of "the PRC shall be responsible for." In conjunction with this change, the words "review of" have been deleted from those subsections that began with those words. The reviews of "all

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items identified under Specification 6.5.3.4 as significant to nuclear safety" was added, the review of "monthly reports from Plant Safety and Licensing" was added, and other responsibilities were combined. Reports of violations of the Technical Specifications will be forwarded to the Vice President - Nuclear Operations Department (NOD) and to the Nuclear Safety Services Department (NSSD) instead of to the Vice President - Nuclear Operations and to the Director of Nuclear Safety.

3. Section 6.5.1.7 - Consumers Power Company has revised the references in this section to reflect the revised Section 6.5.1.6.

We find these changes acceptable as they meet the appropriate acceptance criteria of Section 13.4 of NUREG-0800, of the Standard Review Plan.

C. Section 6.5.2 - Nuclear Safety Board (NSB)

Consumers Power Company has deleted the NSB and replaced it with a full time Nuclear Safety Services Department (NSSD). The NSSD has assumed the responsibilities of the NSB. It reports to the Vice President - Nuclear Operations. The staff of the NSSD will meet or exceed the qualifications described in Section 4.7 of ANSI/ANS 3.1-1987, and shall have no direct responsibility for activities subject to their review.

We find this change acceptable as it meets the appropriate acceptance criteria of Section 13.4 of NUREG-0800, of the Standard Review Plan.

D. Section 6.5.3 - Plant Safety and Licensing

Consumers Power Company has added a new organizational unit titled Plant Safety and Licensing that will function to examine industry operating experience and proposed changes in design and operation to identify issues significant to nuclear safety and to recommend nuclear safety improvements. It will be composed of five experienced technical staff to carry out its functions, which include the review of procedures, tests and experiments, proposed changes or modifications to plant systems as delegated by the PRC, and to determine issues significant for PRC review. For those items not referred to PRC, they shall recommend in writing to plant management approval or disapproval.

We find this change acceptable as it established a formal group to perform reviews for the PRC and to perform some of the functions normally done by an Independent Safety Engineering Group.

E. Editorial

Consumers Power Company has made editorial changes to reflect revised titles and references.

We find these changes acceptable as they reflect changes made to other sections.

### 3.0 ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, with respect to these items, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 4.0 CONCLUSION

We have concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: August 16, 1989

Principal Contributor: Frederick R. Allenspach