

May 31, 1991

Docket No. 50-255

Mr. Gerald B. Slade  
Plant General Manager  
Consumers Power Company  
Palisades Plant  
27780 Blue Star Memorial Highway  
Covert, Michigan 49043

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GPA/PA

Dear Mr. Slade:

SUBJECT: AMENDMENT NO. 139 TO FACILITY OPERATING LICENSE NO. DPR-20:  
(TAC NO. 69559)

The Commission has issued the enclosed Amendment No. 139 to Facility 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 21, 1988, as supplemented July 18 and September 28, 1990.

This amendment modifies the Palisades Plant Technical Specifications (TS) to remove the organization charts following the guidance provided in the Commission's Generic Letter 88-06. The amendment also makes various administrative changes to Section 6.0 of the TS.

This amendment does not incorporate the most recent changes made in your organization. Discussions with your licensing staff indicate that a proposed amendment request describing those changes will be submitted to the staff by May 30, 1991.

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,

original signed by

Brian E. Holian, Project Manager  
Project Directorate III-1  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 139 to License No. DPR-20
- 2. Safety Evaluation

cc w/enclosures:  
See next page

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LA/PD31:DRSP  
PShuttleworth  
5/19/91 MKC

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BHolian BEH  
5/19/91

D/PD31:DRSP  
LMarsh  
5/29/91

OGC  
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JFol  
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PShuttleworth  
5/19/91 *MSK*

PM/PD31:DRSP  
BHolian *BEH*  
5/19/91

D/PD31:DRSP  
LMarsh  
5/29/91

OGC  
*CPW*  
5/13/91



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

May 31, 1991

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Plant Manager  
Palisades Plant  
Consumers Power Company  
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Sincerely,

A handwritten signature in black ink, appearing to read "Brian E. Holian".

Brian E. Holian, Project Manager  
Project Directorate III-1  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 139 to License No. DPR-20
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. Gerald B. Slade  
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 FACILITY OPERATING LICENSE

Amendment No. 139

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 21, 1988, as supplemented July 18, and September 28, 1990, 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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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.2 of Facility 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. 139, 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 January 31, 1991.

FOR THE NUCLEAR REGULATORY COMMISSION



L. B. Marsh, Director  
Project Directorate III-1  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 31, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 139

FACILITY 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.

<u>REMOVE</u>	<u>INSERT</u>
vi	vi
6-1	6-1
6-1a	-
6-1b	-
6-2	6-2
-	6-2a
6-3	6-3
6-3a	-
6-5	6-5

PALISADES PLANT TECHNICAL SPECIFICATIONS  
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## 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.
- 6.1.2 The Shift Supervisor or in his absence from the control room, the second licensed senior operator on duty shall be responsible for the shift command function. A directive to this effect shall be issued annually by the Vice President - Nuclear Operations.

### 6.2 ORGANIZATION

#### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for plant operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the Palisades Plant.

- a. Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented, and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key positions, or in equivalent forms of documentation. These requirements shall be documented in the FSAR.
- b. The Plant General Manager shall be responsible for overall plant safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Vice President - Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

## ADMINISTRATIVE CONTROLS

### 6.2.2 PLANT STAFF

- 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 Senior Reactor Operator shall be in the control room at all times during conditions other than cold shutdown or refueling. In addition to this Senior Reactor Operator, at least one licensed Reactor Operator or Senior Reactor Operator shall be present at the controls at all times when fuel is in the reactor.
- c. A Radiation Safety Technician shall be on site when fuel is in the reactor.
- d. All core alterations, after the initial fuel loading, shall either be performed under the direct supervision of a licensed Senior Reactor Operator or Senior Operator holding a license limited to fuel handling. During this time, no other responsibilities shall be assigned to this individual.
- e. A Fire Brigade of at least 5 members shall be maintained on site at all times. The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown or any personnel required for other essential functions during a fire emergency.
- 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).

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\*The Radiation Safety Technician and the Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence provided immediate action is taken to restore the minimum requirements.

## ADMINISTRATIVE CONTROLS

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### 6.2.2.f PLANT STAFF (Continued)

- 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)

## ADMINISTRATIVE CONTROLS

### 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 A Radiation Safety Manager shall be designated by the Plant General Manager and shall meet or exceed the qualifications of a Radiation Protection Manager as defined in Regulatory Guide 1.8, September 1975.\* The Radiation Safety Manager shall have direct access to Plant General Manager in the matters of radiation safety.
- 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. Specific training for both the Shift Technical Advisor and the Shift Engineer shall include plant design, operations, and response and analysis of the plant for transients and accidents. The Shift Engineer shall hold a Senior Reactor 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.
- 6.3.5 Either the Plant Operations Manager or the Plant Operations Superintendent will hold an SRO license and meet the other requirements of Section 6.3.1 of these Technical Specifications (as applicable to the Operations Manager in ANSI N18.1). The individual holding the SRO license shall be responsible for directing the activities of the licensed operators.

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\*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.

ADMINISTRATIVE CONTROLS

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6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained 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 Fire Brigade training program shall be maintained and 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 an asterisk<sup>(\*)</sup> above may function as the Designated Alternate for the Chairman, and in so doing, are not considered alternate members for voting purposes.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 139 TO FACILITY OPERATING LICENSE NO. DPR-20  
CONSUMERS POWER COMPANY  
PALISADES PLANT  
DOCKET NO. 50-255

1.0 INTRODUCTION

By letter dated September 21, 1988, Consumers Power Company (the licensee) requested an amendment to the Technical Specifications (TS) appended to Facility Operating License No. DPR-20 for the Palisades Plant. The proposed amendment would modify the Palisades Plant TS to remove the organizational charts following the guidance provided in Generic Letter 88-06. The proposed amendment would also make various administrative changes to Section 6.0 of the TS. The licensee revised the original amendment request by letter dated July 18, 1990. The submittal provided an updated TS page which had been changed by a prior amendment. (Amendment 127, involving TS Section 6.2.3 and 6.3.4 on TS page 6-1b was approved by the staff on August 16, 1989. The amendment deleted TS Section 6.2.3, and added Section 6.3.4, which necessitated a renumbering of TS sections in this later amendment.)

The original license amendment request was further revised by letter dated September 28, 1990. NRC staff review deemed that the qualification requirements for the Manager of Operations and Superintendent of Operations were not adequately addressed by the original submittal. The latest, revised amendment request (9/28/90) retains the existing qualification requirements for Operations managers, and for completeness, incorporates the clarifications originally submitted by letter dated July 18, 1990.

2.0 DISCUSSION

The proposed amendment to the Palisades Plant TS consists of the changes as described below. The first change is a result of requirements proposed by Generic Letter (GL) 88-06; whereas, changes 2 through 7 are additional corrections and updates to Section 6.0 of the TS.

1. The proposed changes consist of the removal of organizational charts (TS Figures 6.2-1 and 6.2-2), and the incorporation of text changes to TS 6.2.1 and 6.2.2. The proposed change to TS 6.2.1 deletes the reference to TS Figure 6.2-1 and makes the following editorial notations to the sample TS provided in GL 88-06:

- \* The last sentence of TS 6.2.1.a will read "...These requirements shall be documented in the FSAR."

- \* The Plant Superintendent described in TS 6.2.1.b shall have the revised title of Plant General Manager.
- \* The specified corporate executive position in 6.2.1.c will be the Vice President - Nuclear Operations.

Technical Specification Section 6.2.2 is changed by deleting the sentence beginning "The plant organization..." along with the aforementioned Figure 6.2-2. Also, editorial clarifications are proposed to sections 6.2.2.b and d.

2. Change 6.3.2 to read as follows:

"A Radiation Safety Manager shall be designated by the Plant General Manager and shall meet or exceed the qualifications of a Radiation Protection Manager as defined in Regulatory Guide 1.8, September 1975.\* The Radiation Safety Manager shall have direct access to the Plant General Manager in the matters of radiation safety."

3. In Section 6.3.3 editorial changes were made to clarify the training required for the positions of Shift Technical Advisor and Shift Engineer. The proposed TS more clearly delineates that both positions will receive the specific training indicated below. The proposed Section 6.3.3 reads as follows:

"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. Specific training for both the Shift Technical Advisor and the Shift Engineer shall include plant design, operations, and response and analysis of the plant for transients and accidents. The Shift Engineer shall hold a Senior Reactor Operator License."

4. Due to the incorporation of amendment 127 in the TS since the submittal of this proposal, Section 6.3.4 added in the original proposal has simply been renumbered as Section 6.3.5. This new section is added to delineate the necessary qualifications of the individual responsible for directing the activities of licensed operators (which was deleted by removing the footnotes to Figure 6.2-2). This individual must possess a Senior Reactor Operator License.

5. The retraining and replacement training program described in section 6.4.1 was originally to be maintained under the direction of the Executive Director of Energy Supply Planning, Training, and Administration. Since the organization chart itself is deleted from TS, reference to the Director of such a program is no longer necessary. Section 6.4.1 is proposed to read as follows:

"A retraining and replacement training program for the plant staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 ANSI N18.1-1971 and 10 CFR Part 55."

6. Similarly, Section 6.4.2 has been changed to remove direct or referenced responsibility for the fire brigade training program. The revised Section 6.4.2 reads:

"A fire brigade training program shall be maintained and 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."

7. Revised the Table of Contents as shown on the page changes.

### 3.0 EVALUATION

The licensee's proposed changes to remove the organization charts and make administrative changes to TS 6.0 were reviewed and found to be acceptable. Change number 1 was found to be in accordance with the guidance provided by Generic Letter 88-06. Items 2 through 7 were also individually addressed and their respective evaluations are listed below.

1. Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6.2-1 and 6.2-2 which were removed from the TS.

Functional requirements of the off-site and on-site organizations were defined and added to Specification 6.2.1, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements are documented in the Updated Final Safety Analysis Report.

Consistent with the requirements to document the off-site and on-site organization relationships in the form of the organization charts, the licensee has confirmed that this documentation currently exists in the Updated Final Safety Analysis Report. These changes are considered acceptable.

2. Elimination of the designation "Plant Health Physics Superintendent" in TS 6.3.2 and its substitution with the title "Radiation Safety Manager," as designated by the Plant General Manager, is considered an administrative change. The necessary qualifications for the manager are maintained and; therefore, this is an acceptable change.
3. The editorial changes made to TS 6.3.3 are minor improvements in the wording of the TS which clarify the qualifications and training of the Shift Technical Advisor and the Shift Engineer. These changes are acceptable.
4. The new TS section 6.3.5 calls for the individual responsible for directing the activities of licensed operators to hold a Senior Reactor Operator License. It is understood that the individual directing the activities of licensed operators will fill the position of Plant Operations Manager or Plant Operations Superintendent and will meet the requirements of Operations Manager as stated in ANSI N18.1; therefore, this change is acceptable.

5. The change to TS 6.4.1 is a direct result of the deletion of the organization charts. This specification addresses the plant staff retraining and replacement training program. The portion of the specification being deleted reads "...under the direction of the Executive Director of Energy Supply Planning, Training and Administration...." This change is consistent with the intent of removing specific organizational nonmenclature from the TS. We find this change acceptable.
6. Deletion of the portion of TS 6.4.2 concerning responsibility of the Director of Property Protection for the fire brigade training program reflects the approved changes in organizational descriptions resulting from the removal of the organizational charts. Adequate delegation of responsibility in this area is maintained without direction of the organization charts. Therefore, this change is acceptable.
7. The revision of the Table of Contents is necessary to maintain organizational clarity and, therefore, is an acceptable change.

On the basis of our review of the above items, we conclude that the licensee has provided an acceptable response to these items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TS. Furthermore, we find that these changes are consistent with the staff's generic findings on the acceptability of such changes as noted in Generic Letter 88-06. The additional administrative changes proposed for Section 6.0 of the TS were minor changes which are related to the deletion of the organizational charts and are acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment involves changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the 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 the amendment.

#### 6.0 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.

Principal Contributor: T. Rowell

Date: May 31, 1991