

June 9, 1992

Docket No. 50-255

*See Correction letter
of 8/5/92*

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

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - AMENDMENT NO. 146 TO FACILITY OPERATING LICENSE
NO. DPR-20 (TAC NOS. M76156 AND M81065)

The Commission has issued the enclosed Amendment No. 146 to Facility Operating License No. DPR-20 for the Palisades Plant. This amendment consists of changes to the Technical Specifications in response to your applications dated April 2, 1990 and July 15, 1991; as amended September 27, 1990, and December 20, 1991, respectively.

This amendment revises the Palisades Technical Specifications to:
(1) transfer responsibility for the industry operating experience review program from the plant safety and licensing group to the plant review committee, (2) make various editorial corrections, and (3) incorporate changes from the most recent Palisades Plant reorganization.

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

Sincerely,

Original signed by

Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.146 DPR-20
2. Safety Evaluation

cc w/enclosures:

See next page *SEE PREVIOUS CONCURRENCE

OFFICE	LA:PD31	PM:PD31* <i>aom</i>	LPEB*	OGC	D:PD31 <i>AM</i>
NAME	MShuttleworth <i>msh</i>	AMasciantonio: jkd <i>5/19/92</i>	FAllenspach	<i>OPW</i>	LMarsh
DATE	<i>5/13/92</i>	3/25/92	3/26/92	<i>5/20/92</i>	<i>5/27/92</i>

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PDR ADOCK 05000255
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Mr. Gerald B. Slade
Consumers Power Company

Palisades Plant

cc:

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DATED: June 9, 1992

AMENDMENT NO. 146 TO FACILITY OPERATING LICENSE NO. DPR-20-PALISADES

~~Docket File~~

NRC & Local PDRs

PDIII-1 Reading

Palisades Plant File

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L. Marsh

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A. Masciantonio

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W. Shafer, R-III

cc: Plant Service list

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

CONSUMERS POWER COMPANY

DOCKET NO. 50-255

PALISADES PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 146
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) April 2, 1990 and July 15, 1991; as amended September 27, 1990, and December 20, 1991, respectively, 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;
 - 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 the license amendment and Paragraph 2.C.(2) of Facility Operating License No. DPR-20 hereby issued to Consumers Power Company (the licensee or CPCo) to read as follows:

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Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 146 , 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 its date of issuance.

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: June 9, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 146

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 amendment number and contain marginal lines indicating the area of change.

<u>REMOVE</u>	<u>INSERT</u>
3-40d	3-40d
3-40e	3-40e
3-134	3-134
6-5	6-5
6-5a	6-5a
6-6	6-6
6-6a	6-6a
6-7	6-7
6-8	6-8
6-9	6-9
6-10	6-10
6-26	6-26
6-27	6-27

TABLE 3.6.1
CONTAINMENT PENETRATIONS AND VALVES

PEN NUMBER	SYSTEM NAME AND SERVICE LINE SIZE	VALVE ID NO	REMARKS
39	CONTAINMENT HEATING SYSTEM (4")	CV-1503 Blind flange in place during power operation	Auto isolation valve; required closure time = 25 seconds
40	PRI-COOLANT SYSTEM SAMPLE LINE (1/2")	CV-1910 CV-1911	Auto isolation valve; required closure time = 25 seconds
40A	H ₂ MONITOR (1/2")	SV-2414A SV-2414B	Auto isolation valve; required closure time = 25 seconds
40B	H ₂ MONITOR (1/2")	SV-2412A SV-2412B	Auto isolation valve; required closure time = 25 seconds
41	DEGASIFIER PUMP DISCHARGE (3")	CV-1004 CK-CRW407	Auto isolation valve; required closure time = 25 seconds
42	DEMINERALIZED WATER TO QUENCH TANK (2")	CV-0155 CK-V0155B	Auto isolation valve; required closure time = 25 seconds
44	CONTROLLED BLEED-OFF FROM RCP'S (3/4")	CV-2083 CV-2099	Auto isolation valve; required closure time = 25 seconds
46	CONTAINMENT VENT HEADER (4")	CV-1101 CV-1102	Auto isolation valve; required closure time = 25 seconds

3-40d

Amendment No. 128, 146,

TABLE 3.6.1

CONTAINMENT PENETRATIONS AND VALVES

PEN NUMBER	SYSTEM NAME AND SERVICE LINE SIZE	VALVE ID NO	REMARKS
47	PRIMARY SYSTEM DRAIN TANK PUMP SUCTION (4")	CV-1002 CV-1007	Auto isolation valve; required closure time = 25 seconds
49	CLEAN WASTE RECEIVER TANK CIRCULATION PUMP SUCTION (6")	CV-1038 CV-1036	Auto isolation valve; required closure time = 25 seconds
52	CONTAINMENT SUMP DRAIN TO DIRTY WASTE TANK (4")	CV-1103 CV-1104	Auto isolation valve; required closure time = 25 seconds
55	S/G (E-50B) RECIRCULATION (4")*	CV-0738	Auto isolation valve; required closure time = 25 seconds
67	CLEAN WASTE RECEIVER TANK PUMP RECIRC (3")	CV-1037 CK-CRW408	Auto isolation valve; required closure time = 25 seconds
68	AIR SUPPLY TO AIR ROOM (12")	CV-1813 CV-1814	Auto isolation valve; required closure time = 25 seconds
69	CLEAN WASTE RECEIVER TANK PUMP SUCTION (4")	CV-1045 CV-1044	Auto isolation valve; required closure time = 25 seconds

*Penetration line size; isolation valves are 2-inch.

3.25 ALTERNATE SHUTDOWN SYSTEM

LIMITING CONDITION FOR OPERATION

3.25.1 The Alternate Shutdown System instrumentation and components shown in Table 3.25.1 shall be OPERABLE. Operability shall be demonstrated by performing the surveillances in accordance with Section 4.21. |

APPLICABILITY:

Reactor coolant temperature \geq 325°F.

ACTION:

- a. With less than the "Minimum Equipment" in Table 3.25.1 Operable, restore the inoperable equipment to Operable within 7 days, or provide equivalent shutdown capability and restore the inoperable equipment to Operable within 60 days; or be in Hot Shutdown within the next 12 hours and Cold Shutdown within the following 24 hours.
- b. The provisions of Specification 3.0.3 and 3.0.4 do not apply.

Basis

The operability of the Alternate Shutdown System ensures that any fire will not preclude achieving safe shutdown. The Alternate Shutdown System components are independent of areas where a fire could damage systems normally used to shut down the reactor. This capability is consistent with Regulatory Guide 1.97 and Appendix R to 10CFR50.

ADMINISTRATIVE CONTROLS

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 is composed of ten regular members from either the Palisades staff or the Nuclear Engineering and Construction Organization (NECO) staff. The PRC members shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions. The PRC shall include representatives from the Operations, Radiological Services, Maintenance and Engineering Departments. The members shall be designated in administrative procedures by the Plant General Manager. The Plant General Manager shall also designate the Chairman and alternates in writing.

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.

ADMINISTRATIVE CONTROLS

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 or alternate, and four members or 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 to the Director, Nuclear Performance Assessment Department (NPAD).)
- d. Plant operations to detect potential safety hazards.
- e. Reports of special reviews and investigations as requested by the Plant General Manager or NPAD.
- f. All reportable events as defined in Section 6.9.2.
- g. All items identified under Specification 6.5.3.4 as significant to nuclear safety.
- h. Monthly reports from Plant Safety and Licensing.
- i. Nuclear industry operating experience.

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

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 i. 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 Performance Assessment 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 NPAD.

ADMINISTRATIVE CONTROLS

6.5.2 NUCLEAR PERFORMANCE ASSESSMENT DEPARTMENT (NPAD)

6.5.2.1 FUNCTION

The Nuclear Performance Assessment Department (NPAD) 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. Instrumentation and control
- f. Radiological safety
- g. Mechanical and electrical engineering
- h. Quality assurance practices

6.5.2.2 COMPOSITION

The NPAD shall include the Director, who reports to the Vice President - NOD, and a full-time staff of Nuclear Performance Specialists reporting to the Director. The Director and the Nuclear Performance Specialists shall meet or exceed the qualifications described in Section 4 of ANSI/ANS 3.1-1987. The NPAD shall have no direct responsibility for activities subject to its review.

6.5.2.3 CONSULTANTS

If sufficient expertise is not available within NPAD to review particular issues, the NPAD 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 NPAD 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.

ADMINISTRATIVE CONTROLS

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 by the NPAD staff under the cognizance of the Nuclear Performance Specialists. 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 NPAD 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 Director NPAD, and Management positions responsible for the areas audited within thirty (30) days after completion of the audit.

- 6.5.2.4.3 NPAD review of the subjects in Specifications 6.5.2.4.1 and 6.5.2.4.2 shall be performed by an assigned Nuclear Performance Specialist selected on the basis of his technical expertise relative to the subject being reviewed. If the assigned Nuclear Performance Specialist determines the need for interdisciplinary review, a committee consisting of the Director, NPAD, or his designate, and at least four Nuclear Performance Specialists, shall be assigned.

6.5.2.5 AUTHORITY

The NPAD 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.

ADMINISTRATIVE CONTROLS

6.5.2.6 RECORDS

Records of NPAD 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 proposed changes in design or operation and such other matters as the PRC may assign 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

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 NPAD. |
- 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 NPAD. |

ADMINISTRATIVE CONTROLS

6.9.3.3 Special Reports

- a. Special Reports shall be submitted to the NRC covering the activities identified below pursuant to the requirements of the applicable referenced specifications:

<u>Area</u>	<u>Specification Reference</u>	<u>Reporting Due</u>
Prestressing, Anchorage, Liner and Penetration Tests	4.5.4 4.5.5	90 Days After Completion of the Test*

*A test is considered to be complete after all associated mechanical, chemical, etc., tests have been completed.

- b. Special reports shall be submitted in accordance with 10CFR50.4, within the time period specified for each report.

6.10 RECORD RETENTION

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated:

- 6.10.1 The following records shall be retained for at least five years:
- Records and logs of facility operation covering time interval at each power level.
 - Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
 - All reportable events as defined in Section 6.9.2.
 - Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

ADMINISTRATIVE CONTROLS

RECORD RETENTION (Contd)

- e. Records of changes made to the procedures required by Specification 6.8.1.
- f. Records of radioactive shipments.
- g. Records of sealed source leak tests and results.
- h. Records of annual physical inventory of all source material of record.

6.10.2 The following records shall be retained for the duration of the Facility Operating License:

- a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- c. Records of monthly radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
- f. Records of inservice inspections performed pursuant to these Technical Specifications.
- g. Records of Quality Assurance activities required by the QA Program Description.
- h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- i. Records of meetings of the PRC and reviews performed by NPAD.
- j. Records of monthly facility radiation and contamination surveys.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 146 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letters dated April 2, 1990 and July 15, 1991; as amended September 27, 1990, and December 20, 1991, respectively, Consumers Power Company (the licensee) requested amendment to the Technical Specifications (TS) appended to Facility Operating License No. DPR-20 for the Palisades Plant. The proposed amendment would revise the Palisades Technical Specifications to:

- (1) transfer responsibility for the industry operating experience review program from the plant safety and licensing group to the plant review committee, (2) make various editorial corrections, and (3) incorporate changes from the most recent Palisades Plant reorganization. The supplemental submittals provided additional information and clarifications and did not alter the initial proposed no significant hazards determination.

2.0 EVALUATION

2.1 Industry Operating Experience

Consumers Power Company (CPC) letter dated April 2, 1990 proposed a TS change to delete assignment of the functional responsibility for the Industry Operating Experience Review Program from the TS. Amendment No. 127, dated August 16, 1989 added the Plant Safety and Licensing Group to the Palisades Organization. One of the group's functions was to examine industry safety and to recommend nuclear safety improvements. The NRC staff found this change acceptable as it established a formal group to perform reviews for the Plant Review Committee (PRC) and to perform some of the functions normally done by an Independent Safety Engineering Group.

CPC letter dated April 2, 1990 noted that due to a Palisades Plant reorganization, the responsibility for the Industry Operating Experience Program had been reassigned to a newly created organizational unit under the engineering and maintenance manager. Although CPC's intent is to maintain this function within their organizational structure, they stated that deleting reference to this function from the TS would "allow" management the flexibility to assign this responsibility as the needs of the organizational structure change. As such, CPC requested that TS 6.5.3.1, Plant Safety and Licensing Function be revised to delete reference to the industry operating experience review.

The NRC staff was concerned that deletion of this responsibility from the TS could result in a reduction in CPC's commitment to perform adequate reviews of industry operations experience. Discussion with the licensee indicated that

the Plant Review Committee (PRC) currently performs a nuclear safety review of industry operating experience, and would continue to perform this function regardless of the organizational unit this review is assigned to. CPC supplemented this proposed change by letter dated September 27, 1990, which added nuclear industry operating experience to the list of PRC responsibilities in TS 6.5.1.6 and 6.5.1.7.

We find these changes acceptable as they allow flexibility in the assignment of the industry operating experience review function, yet formalizes responsibility for the nuclear safety review of this program to the PRC.

2.2. Editorial Corrections

CPC has also proposed the following editorial changes to the TS:

1. Change the first "SV-2412B" for penetration 40B in Table 3.6.1 to "SV-2412A".
2. For penetration number 49, change service line size from (3") to (6").
3. Change "4.20" to "4.21" at the end of Section 3.25.1.
4. Change "NSB" to "NPAD" at the end of Section 6.10.2., by deleting "NSB" and adding "reviews performed by NPAD."

Changes 1 and 2 correct typographical errors made during the issuance of Amendment 128 dated September 5, 1989. Change 3 corrects a typographical error made during the issuance of Amendment 122 dated May 19, 1989. Change 4 corrects an oversight made during the issuance of Amendment 127 dated August 16, 1989. We have reviewed these TS amendments and find the proposed editorial changes consistent with previously approved TS sections. Therefore, these changes are considered acceptable.

2.3 Plant Reorganization

Effective April 1, 1991, Consumers Power Company restructured the Nuclear Operations Department (NOD) with emphasis on changes in the engineering off-site review and quality assurance organizations. A new design engineering group, the Nuclear Engineering and Construction Organization (NECO), formed from a combination of resources from existing NOD and Energy Supply Services departments, was implemented and located at Palisades. This group is headed by the Nuclear Engineering and Construction Manager, who reports directly to the Vice President of Nuclear Operations. Another new group, called the Nuclear Performance Assessment Department (NPAD), is responsible for both the traditional QA audit function and the independent review function. This group is headed by the Director, NPAD, who reports directly to the Vice President of Nuclear Operations.

To align the requirements of the Palisades Technical Specifications with the above described organizational changes, a technical specification change was requested by letter dated July 15, 1991. Additionally, to facilitate changes in the Plant Review Committee (PRC) composition, this request proposed to change the composition of the PRC in that the specific titles of members are being deleted and replaced with a generic description. With the management reorganization, some of the position titles listed in the existing technical specifications for PRC members have been eliminated while other comparable position titles have been added. Changes were also proposed to the member qualification requirements and review functions of, the "Off-site Safety Review Group," called NPAD under the new organization.

NRC review of the proposed TS changes resulted in a letter to the licensee dated October 28, 1991, requesting clarification of the following items:

- Minimum PRC and NPAD member qualification requirements,
- PRC quorum requirements,
- Deletion of the second-level NPAD review, and
- NPAD functional area review responsibilities.

The licensee responded with a revised TS amendment request dated December 20, 1991. The revision referenced conservative ANSI standard qualification requirements for PRC and NPAD members. Regarding the PRC quorum, the revision maintained PRC composition at eight members, thereby removing the need to address an increase in the quorum requirement. Regarding second-level NPAD review, the licensee proposed that NPAD will meet at least two times a year. Furthermore, at these meetings, the committee will sample reviews approved by only one independent reviewer. Finally, the licensee has proposed to maintain NPAD review in all areas currently stated in the TS.

The revised TS amendment request is considered acceptable to the staff. PRC make-up, member qualification requirements, and quorum are maintained and are acceptable. Reportable event determinations are properly referenced to TS Section 6.9.2. Changes to organizational unit descriptions (i.e., NPAD) are clearly editorial in nature. And finally, the "Off-site Safety Review Group," NPAD, maintains its independence as a reviewing body with direct access to the Vice-President, Nuclear Operations. This group maintains member qualification requirements in accordance with Section 4.7 of ANSI/ANS 3.1-1987, and will meet as conditions requiring interdisciplinary review arise, but no less than twice yearly. These organizational changes are considered acceptable.

3.0 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.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to administrative procedures. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (56 FR 27041 and 56 FR 41578). Accordingly, 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.

5.0 CONCLUSION

The staff has 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.

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