



**Consumers
Power
Company**

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August 6, 1984

Dennis M Crutchfield, Chief
Operating Reactor Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - TECHNICAL SPECIFICATION CHANGE REQUEST -
PLANT REVIEW COMMITTEE

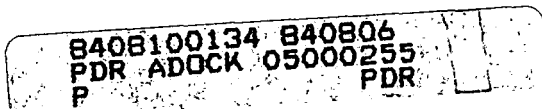
Enclosed are three (3) originals and thirty seven (37) conformed copies of a Request for Change to the Palisades Technical Specifications. The proposed change responds to NRC concerns regarding Plant Review Committee (PRC) review and approval of documents by document routing. NRC Region III letter dated May 1, 1984 and several subsequent telephone conversations with NRC Region III and NRR staff members identified the need for PRC discussion via meeting for certain important issues. The enclosed incorporates these issues.

Pursuant to 10 CFR 170.21, a check in the amount of \$150.00 is attached.

David J Wandewalle
Director, Nuclear Licensing

CC Administrator, Region III, USNRC
RWalker, Branch Chief Region I
NRC Resident Inspector - Palisades

Attachment



OC0884-0004C-NL02

*Rec'd w/check
#404930 FOR
\$150.00*

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CONSUMERS POWER COMPANY
DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT
REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS

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. CHANGE(s)

- A. Insert the following paragraph after item (i) of Section 6.5.1.6.

"PRC review may be performed through a routing of the item subject to the requirements of Specification 6.5.1.7."

- B. Insert the following paragraph after item (c) of Section 6.5.1.7.

"The PRC Chairman may recommend to the Plant General Manager approval of those items identified in Specifications 6.5.1.6 a. through d. 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 the 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 of operation; or (4) the item was reportable to the NRC.

Revised Technical Specification pages are attached. Proposed changes are shown by a vertical line in the right-hand margin.

II. DISCUSSION

Consumers Power Company letter dated February 21, 1984 contained a discussion of the administrative controls employed in the PRC (Plant Review Committee) review and approval of documents by document routing (i.e., ballot). By letter dated May 1, 1984 from James G Keppler (NRC Region III), the NRC Staff responded to our February 21, 1984 letter by stating that committee action (i.e., recommendation of approval or disapproval to the PRC chairman) is required to occur in session, with the quorum present, although review by ballot is allowed. The purpose of the proposed change is to permit Committee reviews and recommended approvals of certain documents to be performed through a ballot-type

II. DISCUSSION (Continued)

review process as opposed to requiring the committee to meet in session to render final decisions. We believe that the firm requirement for a committee meeting, as currently specified by our Technical Specifications, may have a detrimental effect on the involvement of Plant management in the safe operation of the Plant, and should therefore be reconsidered in that light.

Review and Approval Recommendations By Ballot

Consumers Power Company agrees with the NRC in their May 1, 1984 letter that failure "to provide for inter-disciplinary interface and discussion, and application of collective knowledge and wisdom to the proposed issues at hand" has the potential to degrade significantly the purpose and function of the PRC review. However, we feel that the controls previously employed at both our plants adequately provided for this inter-disciplinary interface and discussions while efficiently utilizing staff time. (Note: In accordance with the May 1, 1984 letter and until such time as this matter is finally resolved, we have revised our practices to preclude PRC recommendation of approval of documents other than by holding a meeting.) Our previous procedures required that an "equivalent" quorum of PRC members (i.e., at least five members including the Chairman and no more than two designated alternates) review the document without being required to meet in session and that all comments and concerns identified by this review be resolved prior to recommendation of approval and implementation.

If, in the opinion of the PRC Chairman, the comments led to significant changes to the original document, the revised documents along with all comments and concerns were either recirculated to all reviewers or brought to the next PRC meeting. Thus, each member's comments/concerns were reviewed by the committee as a whole, either individually or in session, allowing ample opportunity for inter-disciplinary interface and discussion. The PRC Chairman could then approve the document review (i.e., recommendation of approval or disapproval to the Plant Manager) or withhold such authorization until approval of the item by the Committee sitting in session.

Alternatives

The following are several alternatives to the preferred method of ballot review and recommendation of approval. The potential impact on the quality of the reviews and on PRC members' time is also discussed.

1. Review by Ballot/Recommendation of Approval Action by Committee in Session

This alternate is currently being followed until this issue is finally resolved. Review is by a "equivalent" quorum of PRC members and is generally via ballot. Final recommendation of

II. DISCUSSION (Continued)

approval action requires a Committee meeting with a quorum present. The second review by the Committee in session will not substantially affect the overall quality of the review, although it will result in additional time being spent in meetings to the obvious detriment of the plant management function.

2. Review and Approval Action by Committee in Session

This alternative would require all PRC activities to be performed in session and would result in an inordinate amount of time being spent in PRC meetings at the obvious expense of the plant management function. Plant managers are primary members of the PRC and are present at most meetings since PRC decisions are considered to be of such importance as to require review and decision by the Plant Management. In addition, the quality of the review of proposed changes might suffer because the members would not have sufficient time prior to the meeting, as a result of the heavy PRC meeting schedule, to solicit comments from their staff. With close to 1,500 items requiring PRC review each year, this alternative would certainly not be practical.

3. Review by Other Appropriate Personnel/Review and Recommendation of Approval Action by Committee in Session

Review by personnel other than PRC members is permitted by Technical Specifications. An initial review could be performed by another organization such as the Nuclear Activities Plant Organization (NAPO), or a subcommittee of PRC members, prior to being presented to the full PRC in session for final review and recommendation of approval action. In fact, this approach is currently being employed for the PRC review of Q-list interpretations at Palisades Plant, but has not been used for PRC review of proposed changes in accordance with 10 CFR 50.59. It has the potential to reduce the workload on the Committee, but at the expense of the quality of the review (the full expertise of the Committee would not be brought to bear on the review of the proposed change since the Committee members, i.e., Plant management, would of necessity be forced to rely heavily on the review performed by the reviewing organization). However, the converse is also a possibility in that the Committee members, being ultimately responsible both as members of PRC and as plant management, may choose to perform the same level of review as would be performed for alternative #2, thereby resulting in a similar time commitment as for that alternative and a substantial duplication of efforts.

Summary

Consumers Power Company believes that the preferred alternative for conducting PRC business is to permit the Chairman to exercise the PRC's review approval authority as discussed previously. All other possible alternatives are expected to either reduce the quality of the reviews performed by the Committee and/or have a significant negative impact on the plant management function.

Analysis of No Significant Hazards Consideration

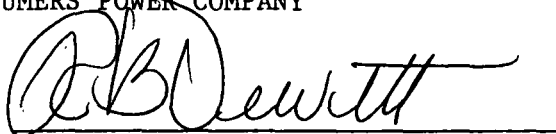
It is believed that this change will result in an improvement in the PRC review and approval process such that the PRC responsibilities will be less burdensome on plant management personnel. Reviews conducted outside of a PRC meeting are more thorough since PRC members are able to concentrate solely on the item being reviewed in a time frame suitable for the individual expertise. The proposed change does not affect any analyzed accident scenario. Therefore, the operation of the facility in accordance with the above change would not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in the margin of safety.

III. CONCLUSION

The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question and therefore involves no significant hazards consideration. This change has also been reviewed under the cognizance of the Nuclear Safety Board. A copy of this Technical Specification Change Request has been sent to the State of Michigan official designated to receive such Amendments to the Operating License.

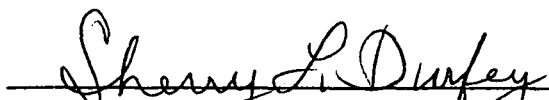
CONSUMERS POWER COMPANY

By



R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 6th day of August 1984.



Sherry L Duffey, Notary Public
Jackson County, Michigan

My commission expires November 5, 1986.

OC0684-0004B-NL02

SHERRY LYNN DURFEY
Notary Public, Jackson County, Mich.
My Commission Expires Nov. 5, 1986