

ATTACHMENT

Consumers Power Company
Palisades Plant
Docket 50-255

PROPOSED TECHNICAL SPECIFICATIONS PAGE CHANGES

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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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6.4 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 an asterisk (*) above may function as the Designated Alternate for the Chairman, and in so doing, are not considered alternate members for voting purposes.

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 review of:

- a. All proposed changes to Operating License and Technical Specifications. /
 - b. 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).) /
 - c. Plant operations to detect potential safety hazards. /
 - d. Reports of special reviews and investigations as requested by the Plant General Manager or NSSD. /
 - e. All reportable events as defined in Section 1.4. /
 - f. All items identified under Specification 6.5.3.4 as significant to nuclear safety. /
 - g. 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.

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 g. above. /
- b. Render determinations in writing with regard to whether or not each item considered under Specifications 6.5.1.6.a, b and f 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 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. Review of safety evaluations may be accomplished through sampling. /
- 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. /

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 shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- 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. /

6.5.2.5 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. /

ADMINISTRATIVE CONTROLS

- 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, plant events, 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 shall provide technical /
 review of safety evaluations performed under 10 CFR 50.59 for: /
- a. Procedures, programs and changes thereto identified in /
 Specification 6.8. /
- b. All proposed tests or Experiments. /
- c. All proposed changes or modifications to plant systems or /
 equipment. /
- d. All proposed changes to Appendix "A" Technical /
 Specifications. /
- 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 c. /
- 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)(1)(A)).
 - b. The safety limit violation shall be reported within 1 hour to the Commission in accordance with 10 CFR 50.36, as well as to the Vice President - Nuclear Operations and to the Chairman - NSB.
 - c. A report shall be prepared in accordance with 10 CFR 50.36 and 6.9 of this specification. (The safety limit violation and the report shall be reviewed by the PRC.)
 - d. The report shall be submitted within 14 days to the Commission (in accordance with the requirements of 10 CFR 50.36), to the Vice President - Nuclear Operations and to the Chairman - NSB.

6.8 PROCEDURES

- 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33 Quality Assurance Program Requirements, as endorsed by CPC-2A QAPD.
 - b. Refueling operations.
 - c. Surveillance and test activities of safety-related equipment.
 - 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. /
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/
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*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 Manager.

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. /
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/

*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. /