

CONSUMERS POWER COMPANY  
Docket 50-255  
Request for Change to the Technical Specifications  
License DPR-20

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in the Facility 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. Changes

A. Revise section 6.2.1 to read as follows and delete Figure 6.2-1.

"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 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."

B. In Section 6.2.2, delete the sentence beginning "The plant organization . . .", and delete Figure 6.2-2. Also, in 6.2.2 b. and d., make editorial corrections inserting word "Reactor" and capitalizing as indicated on page changes.

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- C. 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."

- C1. In Section 6.3.3, make editorial changes to read 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 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."

- D. Add new Section 6.3.4 to read as follows:

"6.3.4 The individual responsible for directing the activities of licensed operators shall hold a Senior Reactor Operator License."

- E. Change Section 6.4.1 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 of ANSI N18.1-1971 and 10 CFR Part 55."

- F. Change Section 6.4.2 to read as follows:

"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."

- G. Revise the Table of Contents as shown on the page changes.

## II. Discussion

Nuclear Regulatory Commission Generic Letter 88-06 dated March 22, 1988 provided guidance for the removal of organization charts from Technical Specification administrative control requirements. These proposed changes follow the guidance of the Generic Letter and remove the organization charts from Palisades Technical Specifications. The changes add general requirements to capture the essential aspects of the organization structure as defined by the existing organization charts. Where necessary, requirements have been added to appropriate specifications for items which are currently not specified in the Technical Specifications outside of the organization charts.

Changes A and B are modeled after the guidance provided in Enclosure 2 of the Generic Letter. Change B and C1 make editorial changes for consistency, in description of Senior Reactor Operator and Reactor Operator, and clarity. Company and plant specific titles and references have been utilized. Changes C and D retain the functional requirements of the footnotes from deleted Figure 6.2-2. However, changes C and D do remove specific titles, which had been contained in the footnotes, but their removal is considered consistent with the Generic Letter guidance.

Changes E and F remove specific titles in Section 6.4.1 and 6.4.2. The responsibility for the training function is implicitly included in new Section 6.2.1. These changes are also considered to be consistent with the intent of Generic Letter 88-06. Removal of the specific titles while maintaining the required function will allow changes in staff titles but will not require changes to the Technical Specifications.

Specific requirements delineated on the current organization charts are already incorporated in other specifications, or have been added as new specifications, or are implicitly included in the new section 6.2.1. Removed from Figure 6.2-1, Offsite Organization, are the footnotes relating to the Nuclear Safety Board which are already in section 6.5.2 and the footnote relating to the fire protection program is implicitly included in the new section 6.2.1. From Figure 6.2-2, Plant Organization, notes A., B., C. and footnote (a) were removed and are implicitly included in the new section 6.2.1. Footnote (b) has been added to 6.3.2 and footnote (c) has been added as new Specification 6.3.4.

### III. Analysis of No Significant Hazards Consideration


These proposed changes do not involve an increase in the probability or consequences of an accident previously evaluated because removal of organization charts and specific titles and editorial changes in Technical Specifications do not affect plant operation. Essential elements of the organizational structure have been retained through the addition of general requirements modeled after the guidance provided by the NRC in Generic Letter 88-06. The NRC will continue to be informed of organizational changes, through changes to the FSAR. These proposed changes do not create the possibility of a new or different kind of accident than previously evaluated because the proposed changes are administrative in nature. No modifications to the plant are being proposed. These proposed changes do not involve a reduction in a margin of safety. Through our Quality Assurance Program implementation and our commitment to maintain qualified personnel in all positions of responsibility and authority, it is assured that safety functions performed by both the onsite and offsite organizations will continue to be performed at a high level of competence. Therefore, these proposed changes do not involve a significant hazards consideration.

IV. Conclusion

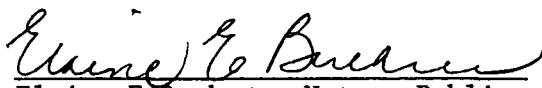
The Palisades Plant Review Committee has reviewed this Technical Specification Change Request and has determined this change does not involve an unreviewed safety question and, therefore, involves no significant hazards consideration. This change has also been reviewed under the cognizance of the Nuclear 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

  
David P Hoffman, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 21st day of September 1988.



Elaine E Buehrer, Notary Public  
Jackson County, Michigan

My commission expires October 31, 1989