

October 28, 1991

Docket No. 50-255

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

Dear Mr. Slade:

SUBJECT: PALISADES PLANT - REORGANIZATION TECHNICAL SPECIFICATION  
SUBMITTAL (TAC NO.M81065)

By letter dated July 15, 1991, Consumers Power Company requested numerous changes to Section 6.0 of the Technical Specifications (TS), "Administrative Controls." A new design engineering group and a Nuclear Performance Assessment Department were formed. Additionally, changes were proposed in the composition of the plant review committee.

The NRC staff is reviewing your submittal and has had discussions with your staff regarding certain aspects of the proposed changes. The enclosure contains comments regarding your proposed changes to Section 6.0 of the TS. We request you respond to this letter in writing within 45 days of receipt. This request affects fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by

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

Enclosure:  
As stated

cc w/enclosure:  
See next page

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Mr. Gerald B. Slade  
Consumers Power Company

Palisades Plant

cc:

M. I. Miller, Esquire  
Sidley & Austin  
54th Floor  
One First National Plaza  
Chicago, Illinois 60603

Mr. Thomas A. McNish, Secretary  
Consumers Power Company  
212 West Michigan Avenue  
Jackson, Michigan 49201

Judd L. Bacon, Esquire  
212 West Michigan Avenue  
Jackson, Michigan 49201

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Jerry Sarno  
Township Supervisor  
Covert Township  
36197 M-140 Highway  
Covert, Michigan 49043

Office of the Governor  
Room 1 - Capitol Building  
Lansing, Michigan 48913

Mr. Patrick M. Donnelly  
Director, Safety and Licensing  
Palisades Plant  
27780 Blue Star Memorial Hwy.  
Covert, Michigan 49043

Resident Inspector  
c/o U.S. Nuclear Regulatory Commission  
Palisades Plant  
27782 Blue Star Memorial Hwy.  
Covert, Michigan 49043

Nuclear Facilities and  
Environmental Monitoring  
Section Office  
Division of Radiological  
Health  
Department of Public Health  
3423 N. Logan Street  
P. O. Box 30195  
Lansing, Michigan 30195

Gerald Charnoff, P.C.  
Shaw, Pittman, Potts &  
Trowbridge  
2300 N. Street, N.W.  
Washington, D.C. 20037

Mr. David L. Brannen  
Vice President  
Palisades Generating Company  
c/o Bechtel Power Corporation  
15740 Shady Grove Road  
Gaithersburg, Maryland 20877

Roy W. Jones  
Manager, Strategic Program  
Development  
Westinghouse Electric Corporation  
4350 Northern Pike  
Monroeville, Pennsylvania 15146

NRC STAFF COMMENTSON PROPOSED SECTION 6.0 REORGANIZATION TS CHANGES

- (1) The current Plant Review Committee (PRC) is comprised of eight members, not including the Chairman. The proposed Technical Specification (TS) has deleted specific member-titles and has proposed a generic statement which would allow the Plant General Manager to change the composition of the PRC without processing a TS change. The NRC staff agrees in principle with your request, however, the following comments should be addressed:
  - (a) The proposed TS wording states that "the PRC members shall meet or exceed the minimum qualifications of ANSI N18.1-1971." Your committee currently is comprised of three Managers, three Superintendents, one Director, and one Shift Supervisor or Shift Engineer. Your proposed generic wording states that the PRC will be comprised of "representatives" from the major plant departments thereby potentially allowing less experienced members to participate in PRC discussions and decisions. PRC member qualifications should, for example, meet or exceed Sections 4.2 and/or 4.4 of ANSI N18.1-1971 (with an exception for an SRO qualified member).
  - (b) The proposed TS increases PRC composition to nine members, not including the Chairman, yet failed to take into account the need to increase the quorum requirement.
- (2) The proposed Nuclear Performance Assessment Department (NPAD) replaces the existing Nuclear Safety Services Department and provides an independent review of activities in the areas of Nuclear Power Plant Operation, Engineering, etc., (it fulfills the requirements of the Offsite Safety Review Function). The following should be addressed:
  - (a) The proposed change deletes the second-level NPAD review. This second-level review was added by Amendment 127, dated August 16, 1989. Sufficient justification for deleting this independent review was not provided for in your application. Crediting a second, in-line organizational review by the originating group, is not acceptable to the staff. A second-level review by the "Offsite Safety Review Group" is warranted, since your NPAD only meets as a committee under special circumstances.
  - (b) The NRC Safety Evaluation approving Amendment 127 recognized that your "off-site safety review" members will meet or exceed the qualifications described in Section 4.7 of ANSI/ANS 3.1-1987. Your current proposal has relaxed the minimum expected qualifications for members, quoting the more general Section 4. This is considered unacceptable.

- (3) Your change proposes to delete NPAD review in the areas of non-destructive testing, administrative controls, emergency planning and training. Your justification for these deletions is to more closely align this sub-section with Standard Technical Specifications (STS). This justification for deleting items from the TS is not acceptable in that it is too selective. There are additional Section 6.0 "Administrative Controls" that could be applied to your TS, should you request a comparison with Standard TS. Therefore, any such proposed deletions should be performed in the context of a larger comparison with Standard TS.