



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

Palisades Nuclear Plant: 27780 Blue Star Memorial Highway, Covert, MI 49043

G B Slade
General Manager

December 20, 1991

**Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555**

**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TECHNICAL SPECIFICATIONS CHANGE REQUEST - ADMINISTRATIVE CONTROLS - REVISION 1**

Consumers Power Company letter dated July 15, 1991 submitted a Technical Specifications Change Request (TSCR) to align the Technical Specification requirements with the April 1, 1991 Nuclear Operations Department (NOD) organizational changes and to facilitate changes to the Palisades Plant Review Committee (PRC).

The proposed changes increased the number of PRC members from nine to ten without increasing the quorum requirement of five. They also eliminated the listing of position titles in favor of allowing the Palisades Plant General Manager to designate PRC members in the Palisades Administrative Procedures - thus eliminating the need to change Technical Specifications in the future whenever a position title is changed.

The April 1, 1991 NOD organizational changes marked the beginning of the Nuclear Performance Assessment Department (NPAD) which is responsible for the reviews which were the responsibility of the Nuclear Safety Services Department (NSSD). Since the NPAD is an organizational unit functioning as an independent review body in compliance with Section 4.3.3 of ANSI N18.7-1976/ANS-3.2 (which does not require second level review except by the supervisor of the unit) and the number of qualified reviewers is increased, no second level technical review within the NPAD was proposed unless the initial reviewer determined it to be necessary. Additionally, since the requirements of a subsection of ANSI 3.1-1987 remain affected by other subsections of that section and to clarify the qualification requirements for those performing independent review (Nuclear Performance Specialists), the July 15, 1991 TSCR proposed the qualification requirement for the Nuclear Performance Specialists to be changed from Section 4.7 of ANSI 3.1-1987 to include all the subsections of Section 4 of ANSI 3.1-1987.

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As a result of telephone discussion between the NRC staff and the Palisades staff, NRC letter dated October 28, 1991 forwarded comments regarding our July 15, 1991 proposed changes and requested a response within 45 days of its receipt. Subsequently, in view of the revision being made to the July 15, 1991 TSCR, the NRC Palisades Project Manager agreed to waive the 45 day requirement. The following is our response to those comments and the technical specifications revisions we propose in view of those comments.

1. Comment (1)(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 Section 4.2 and/or 4.4 of ANSI N18.1-1971 (with an exception for an SRO qualified member)."

Response

The proposed change is revised to require PRC members to have qualifications at least equivalent to those described in Section 4.4 of ANSI N18.1-1971. (See attachments)

2. Comment (1)(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."

Response

The proposed change is revised to keep the PRC composition at the existing eight members, not including the Chairman. There is no change to the existing quorum requirement. (See attachment)

3. Comment (2)(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."

Response

The proposed change is revised to require NPAD Independent Safety Review (ISR) meetings at least twice yearly and as conditions requiring interdisciplinary review may warrant. The initial NPAD Specialist reviewer has the option of requesting a second review by another Specialist, requesting an item be reviewed at the next ISR meeting or requesting an item be reviewed at a special meeting called for such purpose. NPAD procedures require that samples of reviews approved by only one independent reviewer shall be reviewed again in the twice yearly NPAD ISR meetings.

Thus, while not requiring a second-level review per se, the proposed change provides for levels of reviews appropriate to assure that required review is accomplished and that unreviewed safety questions will be identified. (See attachments). The Nuclear Performance Specialists Group within NPAD is considered an organizational unit functioning as an independent review body which is the ANSI N18.7-1976/ANS-3.2 preferred method of review; and, as such, meet the independent review program requirements of Section 4.3 of ANSI N18.7-1976/ANS-3.2.

4. Comment (2)(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."

Response

Consumers Power Company has revised the July 15, 1991 proposed change to refer to Section 4.7 ANSI/ANS 3.1-1987 with the understanding that "General" provisions of Section 4.1 would also apply. This is necessary to assure qualified Specialists who may not hold degrees in engineering or science can be assigned reviews of non-engineering areas specified in Section 6.5.2.1, such as emergency planning.

5. Comment (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."

Response

Consumers Power Company has revised our July 15, 1991 proposed change to the areas for which NPAD shall function to review. Thus, Section 6.5.2.1 is not changed except that NPAD shall function to provide review instead of NSSD. (See attachments)

Attachment 1 contains revised proposed technical specifications pages. Attachment 2 contains existing technical specifications pages marked up to show the proposed changes. Attachment 3 contains changed pages proposed by our July 15, 1991 submittal marked up to show the revisions to those changes proposed by this Revision 1. Attachment 4 contains organizational charts for the restructured Nuclear Operations Department.



Gerald B Slade
General Manager

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachments

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 February 21, 1991, for the Palisades Plant be changed as described in Section I below:

I. Changes

A. Revise Section 6.5.1.2 as follows:

"6.5.1.2 COMPOSITION

The PRC is composed of nine regular members from either the Palisades staff or the Nuclear Engineering and Construction Organization (NECO) staff. The qualification level for PRC members shall be at least equivalent to those described in Section 4.4 of ANSI N18.1-1971. 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 Alternate Chairmen in writing."

B. Delete the last sentence of Section 6.5.1.3.

C. Change Section 6.5.1.5 to read:

"A quorum of the PRC shall consist of the Chairman or Alternate Chairman and four members (including alternates)."

D. Change Section 6.5.1.6.c as follows:

"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).)"

E. Change Section 6.5.1.6.f and 6.10.1.c to read:

"All reportable events as defined in Section 6.9.2."

F. In Sections 6.5.1.6.e, 6.5.1.7.c and 6.5.1.8 change "NSSD" to "NPAD" and "Nuclear Safety Services Department" to "Nuclear Performance Assessment Department" as applicable.

- G. Change the title of Section 6.5.2 to "NUCLEAR PERFORMANCE ASSESSMENT DEPARTMENT (NPAD)".
- H. In Section 6.5.2.1 change "Nuclear Safety Services Department (NSSD)" to "Nuclear Performance Assessment Department (NPAD)."

- I. Change Section 6.5.2.2 to read:

"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 4.7 of ANSI/ANS 3.1-1987. The NPAD shall have no direct responsibility for activities subject to its review."

- J. In Section 6.5.2.3, change "NSSD" to "NPAD" in two locations.
- K. In Section 6.5.2.4.1, change "NSSD" to "NPAD".
- L. Delete the first sentence and the second sentence before the colon in Section 6.5.2.4.2 and insert:

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:

- M. In Section 6.5.2.4.2.f, change "NSSD" to "NPAD."
- N. Delete "NSSD" from the last paragraph of Section 6.5.2.4.2 and insert "Director, NPAD".
- O. Change Section 6.5.2.4.3 to read:

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 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. Such committee shall meet as conditions requiring interdisciplinary review arise, but no less than twice yearly.

- P. In Sections 6.5.2.5, 6.5.2.6, 6.7.1.b and 6.7.1.d change

"NSSD" to "NPAD."

II. Discussion

This request changes the composition of the PRC by deleting specific titles and replacing them with a generic statement which allows the Plant General Manager to change the composition of the PRC without processing a Technical Specifications change every time a position title changes. Members of the PRC will meet at least the equivalent of the qualifications described in Section 4.4 of ANSI 18.1-1971 and thus meet the criteria of Standard Review Plan 13.4.

The Nuclear Performance Assessment Department (NPAD) is an organizational unit functioning as an independent review body which provides independent review of activities in the areas where review was previously performed by the Nuclear Safety Services Department. NPAD review (described in change 0 above) will be performed by a Nuclear Performance Specialist appointed on the basis of his expertise in the area concerned. If the appointed Nuclear Performance Specialist determines the need for additional review, the subject of the review will be further evaluated by a committee consisting of the Director, NPAD, and at least four Nuclear Performance Specialists. Thus, if review by a multi-disciplined committee is deemed appropriate by the appointed reviewer, further review is performed by committee. This practice combines the best features of past review practices. Both the practice of committee review and the practice of individual review have existed in the past. This proposed change combines the most effective parts of each. As was the case previously (Section 6.5.2.3), consultants may be used where sufficient expertise is not available within NPAD. Second level NPAD review will no longer be required. Review by a Nuclear Performance Specialist provides, in most cases, sufficient depth of review to assure the margin of safety. In those cases when the Director, NPAD, or the appointed reviewer determines more depth of review is appropriate, the aforementioned committee will provide it. The Director, NPAD, and the Nuclear Performance Specialists will also meet at least twice yearly and review at least one independent review performed by each specialist.

The requirement that NSSD staff meet or exceed the qualifications described in Section 4.7 of ANSI/ANS 3.1-1987 continues in effect for the Director and Nuclear Performance Specialists of the NPAD staff. Thus, Section 6.5.2.2 continues to meet the acceptance criteria of Section 13.4 of the Standard Review plan.

Sections 6.5.1.6.4 and 6.10.1.c (change D) now refer to reportable events as required by Section 6.9.2 instead of as defined by Section 1.4. This change is editorial and is for

clarity and consistency since both Sections 1.4 and 6.9.2 refer to 10CFR50.73.

Changes D, F, G, J, K, M and P only change the name of the reviewing or receiving department from Nuclear Safety Services Department (NSSD) to Nuclear Performance Assessment Department (NPAD). As discussed above, this proposed Technical Specifications change does not significantly change the type of review or the skill, experience or knowledge required for effective Company review. These changes are purely administrative.

Change H describes and prescribes the composition of the NPAD, ensures its direct access to the Nuclear Operations Vice President and requires its independence as a reviewing body.

III. Analysis of No Significant Hazards Consideration

Consumers Power Company finds, in compliance with 10CFR50.92(c), that activities associated with this change request involve no significant hazards. The following evaluation supports that finding.

1. Will the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

This change does not affect the probability or consequences of an accident. The changes are to the administrative section of the TS with the significant changes affecting the PRC composition and changing the method of independent review.

The PRC member titles will be removed from the TS to facilitate not requiring that a TS change be submitted for NRC approval when position titles change. PRC member qualifications will still be consistent with those described for the Plant Staff and meet or exceed Section 4.4 of ANSI 18.1-1971 as endorsed by the NRC in SRP 13.4. The Plant General Manager will be required to designate the PRC members, chairman and alternate chairmen in administrative procedures. This places appropriate authority over PRC selection. Therefore, these changes will not affect the probability or consequences of an accident.

The review method of the organizational unit functioning as an independent review body continues to meet the requirements of ANSI N18.7-1976/ANS 3.2 but has changed in that a second level review is no longer required. When necessary, the depth of review will be enhanced as appropriate either through the past practice of use of consultants or by

committee review. The independent review body (the Nuclear Performance Assessment Department) staff tasked with review of the TS required functional areas will continue to meet or exceed the qualifications described in Section 4.7 of ANSI/ANS 3.1-1987 in accordance with SRP 13.4. This change is administrative and does not increase the probability or consequences of an accident.

The change to reference the reporting requirements to Section 6.9.2 is purely administrative to gain consistency throughout the technical specifications.

Thus the changes proposed do not affect the operation or material condition of the facility. The accident analyses are not affected by this proposed change. Proper review and independent oversight by qualified personnel as recommended or required by the Standard Review Plan and Administrative Procedures will be in place. Therefore, the changes do not increase the probability or consequences of an accident.

2. Will the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

The composition of onsite Plant Review Committee (PRC) and the independent review body (NPAD) will be made up of qualified individuals providing functional reviews that are consistent with the Standard Review Plan and administrative program requirements. These changes are purely administrative and do not affect the material condition, plant operation or accident analyses; and therefore, do not create the possibility of a different type of accident than any previously evaluated.

3. Will the proposed change involve a significant reduction in the margin of safety?

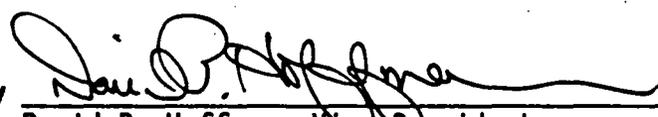
The changes to PRC composition provide internal flexibility in changing the organization titles, but do not reduce the PRC function to provide review and advise the Plant General Manager on matters of nuclear safety. The PRC will be composed of individuals from appropriate functional areas of Operations, Maintenance, Radiological Services, and Engineering Departments and will be designated in administrative procedures by the Plant General Manger. The NPAD will continue to provide an independent overview by qualified individuals, or by committee, of the functional areas delineated in the TS. These changes are administrative and do not affect the material condition or plant operation and neither the consequences of an accident nor the fission product boundaries have been affected. Therefore the margin of safety has not been reduced.

IV. Conclusion

The Palisades Plant Review Committee has reviewed this Technical Specifications Change Request and has determined that this change does not involve an unreviewed safety question. Further, the change involves no significant hazards consideration. This change has been reviewed by the Nuclear Performance Assessment Department. A copy of this Technical Specifications Change Request has been sent to the State of Michigan official designated to receive such Amendments to the operating license.

CONSUMERS POWER COMPANY

To the best of my knowledge, information, and belief, the contents of this Technical Specifications Change Request are truthful and complete.

By 
David P. Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 20th day of December 1991.


Notary Public
County, Michigan
My commission expires

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VAN BUREN COUNTY, STATE OF MICHIGAN
MY COMMISSION EXPIRES 06-06-94