Consumers Power

POWERING MICHIGAN'S PROGRESS

David W. Rogers
Plant Safety and Licensing Director

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

June 2, 1993

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
NOTIFICATION OF PROPOSED CHANGE FOR THE PALISADES EMERGENCY PLAN

Enclosed is a description of a proposed change to the Palisades Site Emergency Plan. Even though we have determined that the impact of this change is minimal and this revision does not decrease the effectiveness of the plan in accordance with 10 CFR 50.47, we have decided to submit the revision to you before implementation to allow your review and response if necessary. We plan on implementing the revised plan after your review and approval.

The shift staffing requirements for chemistry technicians, mechanics, and electricians in Section 5, Table 5-6, pages 1 and 2 of the Palisades Emergency Plan (Attachment 1), is being reduced to zero. This revision also allows a reduction in shift staffing for radiation safety technicians to one technician 24 hours per day, 7 days per week. This change does reduce the number of hours committed to these positions according to the plan, however, the effectiveness of the plan is based on the minimum staffing levels that are required on shift (operations, radiation protection and security) and who are able, as required by the plan, to initiate actions and respond to initial emergency conditions. The plan effectiveness, based on the ability to call-in chemistry, mechanical, and electrical maintenance personnel to respond to emergency conditions, has not been affected by this change.

The call-in system is an automatic telephone notification system which is activated whenever an Alert or higher level of emergency class is declared. The automatic telephone notification system utilizes four phone lines, and through a pre-recorded message, informs plant personnel that they should report to the plant. This system is tested semi-annually. During the testing, tape recordings of the employee responses to the phone calls are made. The employees are instructed to respond to the calls with an estimate of how soon the employee could be on-site. These responses are used to verify that adequate staffing levels can be achieved to meet NUREG 0654 requirements.

A045

In a letter dated August 21, 1990 we notified the NRC of a proposed change to the Palisades Emergency Plan that would allow a reduction in shift staffing during cold shutdown for chemistry technicians, mechanical maintenance and electrical maintenance. To support that plan revision we pointed out that the change reduced the number of hours committed to these positions by the plan, but did not decrease the effectiveness of the plan. The effectiveness of the plan was not reduced as the minimum staff required on-shift, even with this reduction, is able as required by the plan to initiate actions and respond to initial emergency conditions. We pointed out that the effectiveness of the plan is based on the ability to call-in chemistry, mechanical and electrical maintenance personnel to respond to emergency conditions, and is not based on maintaining these personnel on-shift.

The NRC's February 22, 1991 response determined that even though the proposed revision would downgrade the emergency response capabilities, the impact of the changes was determined to be minimal and therefore acceptable.

David W. Rogers
Plant Safety and Licensing Director

CC: Administrator Region, III, USNRC (2 copies)
NRC Resident Inspector-Palisades

ATTACHMENT

Consumers Power Company
Palisades Plant
Docket 50-255

NOTIFICATION OF CHANGE FOR THE PALISADES EMERGENCY PLAN

June 2, 1993

2 Pages

CONSUMERS POWER COMPANY
DOCKET 50-255
CHANGE TO THE PALISADES SITE EMERGENCY PLAN
LICENSE DPR-20

Consumers Power is revising the Palisades Site Emergency Plan regarding the minimum staffing levels for the positions of Mechanical Maintenance Repairworkers, Electrical Maintenance Repairworkers, Chemistry Technicians, and Radiation Safety Technicians. The changes, discussion, and conclusion sections for the changes to the Palisades Site Emergency are as follows:

1. Changes

   A. The change is to Section 5, Table 5-6, pages 1, 2, and 3 as follows;

      For Chemistry Technicians, the current staffing requirement of two 8 hour shifts, 7 days a week excluding holidays; would be changed to no on-shift staffing requirement.

      For Mechanical Maintenance, the current staffing requirement of 24 hours a day, 5 days a week excluding holidays; would be reduced to no on-shift staffing requirement.

      For Electrical Maintenance, the current staffing requirement of two 8 hour shifts, 5 days a week excluding holidays; would be reduced to no on-shift requirement.

      For Radiation Safety Technicians, the current staffing requirement of one technician 24 hours per day, 7 days per week plus 1 technician for two 8 hour shifts, 5 days a week excluding holidays; would be reduced to one technician 24 hours per day 7 days a week.

2. Discussion

   This change to the Emergency Plan does reduce the number of on shift hours committed to these positions and could be interpreted as a reduction in effectiveness. However, the actual minimum staff authorized currently for a portion of each week will be unchanged. This minimum staff required on shift (Operations, Radiation Safety, and Security) is able, as required by the Plan, to initiate actions and respond to initial emergency conditions. Additional personnel who are on shift for only a portion of the week are not needed for this initial response. For significant portions of each week, the effectiveness of the Plan is based on the ability to call-in additional Chemistry, Radiation Safety, Mechanical, and Electrical personnel as needed to respond to emergency conditions and is not based on maintaining these positions on shift. We also expect that this minimum on

site staffing requirement will be frequently exceeded due to the activities associated with operating and maintaining the Plant.

Palisades has been successfully using an on-call system where a list of on-call personnel is maintained in the Shift Supervisor's office for Chemistry, Electrical, and Mechanical Maintenance personnel. Palisades maintains a trained emergency staff that may be activated by using a system of telecomputers and/or a manual call-out list. The telecomputers are machines capable of calling personnel and giving them a prerecorded message asking if they are available to respond to a Plant emergency. The response to the telecomputers and manual calling has been excellent. Per our plant emergency implementing procedures we have established a programmatic requirement to regularly verify the response time commitments are being achieved. The proposed changes would not effect Palisades' ability to meet on-shift requirements for Operations, fire fighting, rescue operations, security, or in-plant radiation surveys.

3. Conclusion

While the required number of personnel on shift at certain times may be reduced, the ability to call in additional resources when needed assures that the ability to deal with emergency conditions is not significantly compromised. This reduction in on shift staffing levels is, therefore, acceptable.