



**Consumers  
Power**

**POWERING  
MICHIGAN'S PROGRESS**

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

**Kurt M. Haas**  
*Plant Safety and Licensing Director*

July 5, 1995

U S Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

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

A request for a change to the Palisades Technical Specifications is enclosed. The proposed changes all pertain to the Administrative Controls Section of the Technical Specifications. The changes involve the following:

- A. Deletion of Section 6.4, TRAINING, which is redundant to the requirements in 10CFR55.
- B. Revision of Section 6.5.1.2, on the Plant Review Committee Composition, to clarify the membership and designation of members in the administrative procedures.
- C. Revision to Sections 6.5.3.1 and 6.5.3.2, to clarify and modify the Function and Composition of the Plant Safety and Licensing staff review requirements.

SUMMARY OF COMMITMENTS

This letter contains no new commitments and no revisions to existing commitments.

Kurt M. Haas,  
Plant Safety and Licensing Director

CC Administrator, Region III, USNRC  
Project Manager, NRR, USNRC  
Resident Inspector, USNRC - Palisades  
State of Michigan

Attachments

9507110249 950705  
PDR ADDCK 05000255  
P PDR

110014

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

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 below:

I. Changes

It is proposed that specification 6.4, Training, be deleted from the Technical Specifications Administrative Controls section. This proposal is an administrative change that will correct an out-of-date statement in the specifications. The change is also consistent with Revision 1, dated April 7, 1995, of the Combustion Engineering Owners Group Standard Technical Specifications, NUREG-1432, which has similarly removed the corresponding Training section from the specifications.

It is also proposed that specifications 6.5.1.2, Plant Review Committee Composition; 6.5.3.1, Plant Safety and Licensing Function; and 6.5.3.2, Plant Safety and Licensing Composition, be changed to reflect the present plant organization, specifically require PRC membership be described in the plant Administrative Procedures, clarify the review function, and delete the specific staff size for the Plant Safety and Licensing staff. These changes are administrative and, in part, remove descriptions that require periodic revision as plant organizations change. Revising these descriptions to permit organization changes is burdensome to both the NRC and plant staff.

II. Discussion of Proposed Changes

The change to remove Section 6.4, Training, will correct an out-of-date statement in the specifications. The specification refers to Appendix "A" of 10 CFR Part 55 which has been removed from the regulations. Appendix "A" of 10CFR55 previously addressed operator requalification. These requirements have been incorporated into paragraph 55.59 and in other supporting paragraphs. Any regulation in 10 CFR is sufficient in its requirements such that regulation compliance need not be reiterated in the Technical Specifications. Stipulating in the Technical Specifications that a regulation must be followed creates a redundant requirement that adds no value, and causes an administrative burden to the utility and to the NRC in making changes. As a result, NUREG 1432 was revised on April 7, 1995 and the corresponding "Training" section, previously in the Standard Technical Specifications, was removed.

Palisades, like other United States nuclear utilities, has training programs that are accredited by the National Academy for Nuclear Training Accreditation Board. There are twelve Accredited Training Programs at Palisades; six in Operations, Chemistry, Health Physics, Electrical, Mechanical, Instrument and Control and Engineering Support. These programs meet or exceed the training requirements presently specified in Technical Specifications Section 6.4 and are controlled through our administrative processes.

Removal of Technical Specifications Section 6.4 will also result in deletion of a statement that "...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 . . ." . Section 5.5 of this ANSI Standard, Retraining and Replacement Training, describes, in general, the training program scope. These guidelines are met or exceeded by 10CFR55 requirements. Therefore, removal of the reference to the ANSI standard will not reduce the training requirements for the operations staff. In addition, by reference to ANSI N18.1-1971 in Section 6.3.1 of the Palisades Technical Specifications, the plant staff, including the operations staff, will continue to meet or exceed these minimum staff qualifications.

The remaining portion of the proposed Technical Specifications change addresses the Administrative Controls for the composition of the Palisades on-site review committee, the Plant Review Committee (PRC), and the composition of the Plant Safety and Licensing organization which functions to review proposed plant changes on behalf of the PRC. The change to the PRC Section 6.5.1.2, COMPOSITION, is administrative and does not affect the present composition in any manner. It clarifies the makeup of the PRC by removing descriptive words that could be misinterpreted as to what comprises the plant staff. Prior to the present organization, plant staff members were differentiated from the engineering organization (NECO) and reported to the Plant General Manager. With the present Palisades site organization under the onsite Vice President, the site staffs reporting to the Plant General Manager, Engineering and Modifications Manager, Plant Safety and Licensing Director, and Nuclear Services Manager are all considered plant staff. Differentiation of the plant staff from the engineering (NECO) staff in the Technical Specifications is no longer appropriate. Furthermore, the engineering organization has reorganized and has been renamed as the Engineering and Modifications Department, but has also retained the NECO designation because that name still appears in this Technical Specification. It is no longer desirable to maintain the NECO name.

It is also proposed that Section 6.5.1.2, COMPOSITION, be altered by requiring the chairman, alternate chairmen, and members of the PRC to be designated in administrative procedures by the Plant General Manager. At present the designation of the chairman and alternate chairmen is made in memorandum form by the Plant General Manager, and only the members are listed in the administrative procedures. This proposed change will consolidate the requirements and provide the appropriate controls for designating the PRC membership. Like the other changes to this section, this is an administrative change.

The proposed change to the Plant Safety and Licensing Section 6.5.3.1, FUNCTION, provides an administrative change in the description of the organization function. Changes to Section 6.5.3.2, COMPOSITION, clarify that only those members of the Plant Safety and Licensing staff responsible for the review function described in the Technical Specifications must meet the qualifications in Section 6.3. The Plant Safety and Licensing department has several different functions. These

functions include those described in the Technical Specifications, as well as several other functions not described in the Technical Specifications which have different qualification requirements. This proposed change implicitly recognizes that these other functions exist.

This proposed change, to Section 6.5.3.2, also removes the stipulation that the Plant Safety and Licensing staff have at least five persons qualified to conduct the reviews delegated to them. In the original conception of the department review responsibilities, a minimum staff of five members was considered as necessary. In practice, however, even though five individuals in the Plant Safety and Licensing staff have remained qualified to conduct the reviews on behalf of the Plant Review Committee, nearly all the reviews have been handled by three individuals. In addition, we consider the number of persons necessary to conduct these reviews to be a matter to be handled administratively, as it can fluctuate with the workload. Therefore, the number of Plant Safety and Licensing individuals qualified to perform the reviews is not specified in this proposed change.

The proposed change to Section 6.5.3.2 also removes the title to which the Plant Safety and Licensing staff reports; the Plant Safety and Licensing Director. This, too, is considered as an unnecessary Technical Specifications administrative requirement as the titles of personnel can be changed quite frequently. Titles should be strictly under the control of the licensee. Furthermore, the NRC staff guidance has been to remove items such as these which frequently change and cause unnecessary burden on both the Palisades staff, and especially the NRC staff, in reviewing and issuing of an amendment. There is no present intent to transfer the Plant Safety and Licensing review function from under the Plant Safety and Licensing Director to some other department in which documents requiring PRC review are originated. However, departmental independence is not considered a necessity to assure quality reviews by the Plant Safety and Licensing staff.

### III. Analysis of No Significant Hazards Consideration

Consumers Power Company finds the activities associated with this Technical Specifications change in compliance with 10CFR50.92(c) and that a no significant hazards determination is justified. The following evaluation supports the finding that operation of the facility in accordance with the proposed Technical Specifications would not:

#### A. 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 administrative, deleting an unnecessary specification on staff training requirements, eliminating the specific references to the Nuclear Engineering and Construction Organization (NECO) staff, and requiring that the Plant Review Committee (PRC) chairman, alternate chairman, and members be designated in administrative procedures by the Plant General

Manager. Further administrative changes clarify the function of the Plant Safety and Licensing organization and eliminate the numerical requirement for five staff members to fulfill the organization function.

The removal of an obsolete staff training requirement does not diminish the regulatory requirement to have an adequately trained staff. The accredited training programs for the plant staff ensure an appropriate level of training is conducted to maintain an appropriate skill and knowledge base for the staff. The requirements of 10CFR55 provide the necessary rules for operator licenses. Since a trained staff will be maintained, there will no increase in the probability or consequences of an accident as a result of this change.

The composition of the PRC will not be affected by this change as it will, at a minimum, be comprised of personnel from the operations, engineering, radiological services and maintenance departments as required by the Technical Specifications. The composition of the Plant Safety and Licensing organization as a whole may change. The function of the organization as it relates to these Technical Specifications, however, will not be affected. These changes have no affect on the plant accident analyses. Qualified personnel will continue to conduct the PRC and Plant Safety and Licensing reviews. Therefore, the changes do not increase the probability or consequences of an accident.

B. Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes are administrative and do not create the possibility of a new or different kind of accident. Staff training will continue to meet the accreditation requirements of the National Academy for Nuclear Training Accreditation Board and the requirements for the Systematic Approach to Training. Operators' license training will continue to meet the regulatory requirements of 10CFR55. Activities conducted by the Plant Review Committee and the Plant Safety and Licensing staff will continue to be accomplished by a staff which meets the qualification requirements of the Technical Specifications. These administrative changes will not affect the operation of the plant or the safety function of plant equipment nor will it affect the quality of the review activities. Therefore, there will be no possibility that a new or different kind of accident will be created.

C. Involve a significant reduction in a margin of safety.

The changes do not affect installed plant equipment nor do they affect plant operations. These administrative changes have not affected the probability or consequences of a previously analyzed


accident or created the possibility of a new or different kind or accident from any previously evaluated. Therefore, they do not involve any reduction in the margin of safety.

IV. Conclusion

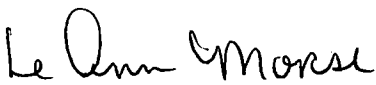
The Palisades Plant Review Committee has reviewed this Technical Specifications change request and has determined that the change involves no significant hazards consideration. This change has been reviewed by the Nuclear Performance Assessment Department. A copy of this Technical Specifications change request has been sent to the State of Michigan.

CONSUMERS POWER COMPANY

To the best of my knowledge, the contents of this Facility Operating License and Technical Specifications change request, proposing changes to the Administrative Controls section, are truthful and complete.

By   
Thomas J. Palmisano  
Plant General Manager

Sworn and subscribed to before me this 5 day of July 1995.

  
LeAnn Morse, Notary Public  
Berrien County, Michigan  
(Acting in Van Buren County, Michigan)  
My commission expires February 4, 1997

