

CONSUMERS POWER COMPANY  
Docket 50-155  
Request for Change to the Technical Specifications  
License DPR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in Facility Operating License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964, for the Big Rock Point Plant be changed as described in Section I below:

I. Change(s)

All changes are identified in Attachment 1.

II. Discussion

On July 11, 1979, Consumers Power Company elected two new Vice Presidents as part of a reorganization in the Energy Supply organization. In this change, Russell B DeWitt was named Vice President for Nuclear Operations. The organizational changes were made to recognize the increased emphasis placed on nuclear power at Consumers Power and the industry; and, to recognize the added impact of all major generating plants and integrated system operations on the overall success of Consumers Power Company. In addition to the new Vice President position, each of Consumers Power Company's major plants will be headed by a General Manager who will report directly to an officer of the Company. The Big Rock Point Plant (because of its size) will be headed by a Plant Superintendent reporting directly to the Vice President for Nuclear Operations.

The proposed plant organization parallels that currently used at our Midland Plant. Under the proposed organization, responsibilities of the Plant Superintendent and the Operations & Maintenance Superintendent are modified. The Plant Superintendent is responsible for the safe, reliable and efficient operation of the Big Rock Point Plant. The Operations & Maintenance Superintendent is responsible for coordinating the efforts of the operations, maintenance and health physics functions of the plant. Personnel who have responsibility in these operational, maintenance and radiation protection areas report to the Operations & Maintenance Superintendent. This represents an enhancement of management attention to safety and radiation protection because the Operations & Maintenance Superintendent will not be responsible for the administrative functions to be handled by the Plant Superintendent or other personnel reporting to the Plant Superintendent.

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All proposed changes within the text of the Administrative Controls Section (Chapter 6) of the Technical Specifications are consistent with the changes on the organization charts (Figures 6.2-1 and 6.2-2).

III. Conclusion(s)

Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have reviewed these changes and recommend their approval.

CONSUMERS POWER COMPANY

R B DeWitt

R B DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 16th day of July, 1979.

Dorothy H. Bartkus

Dorothy H Bartkus, Notary Public  
Jackson County, Michigan

My commission expires March 26, 1983

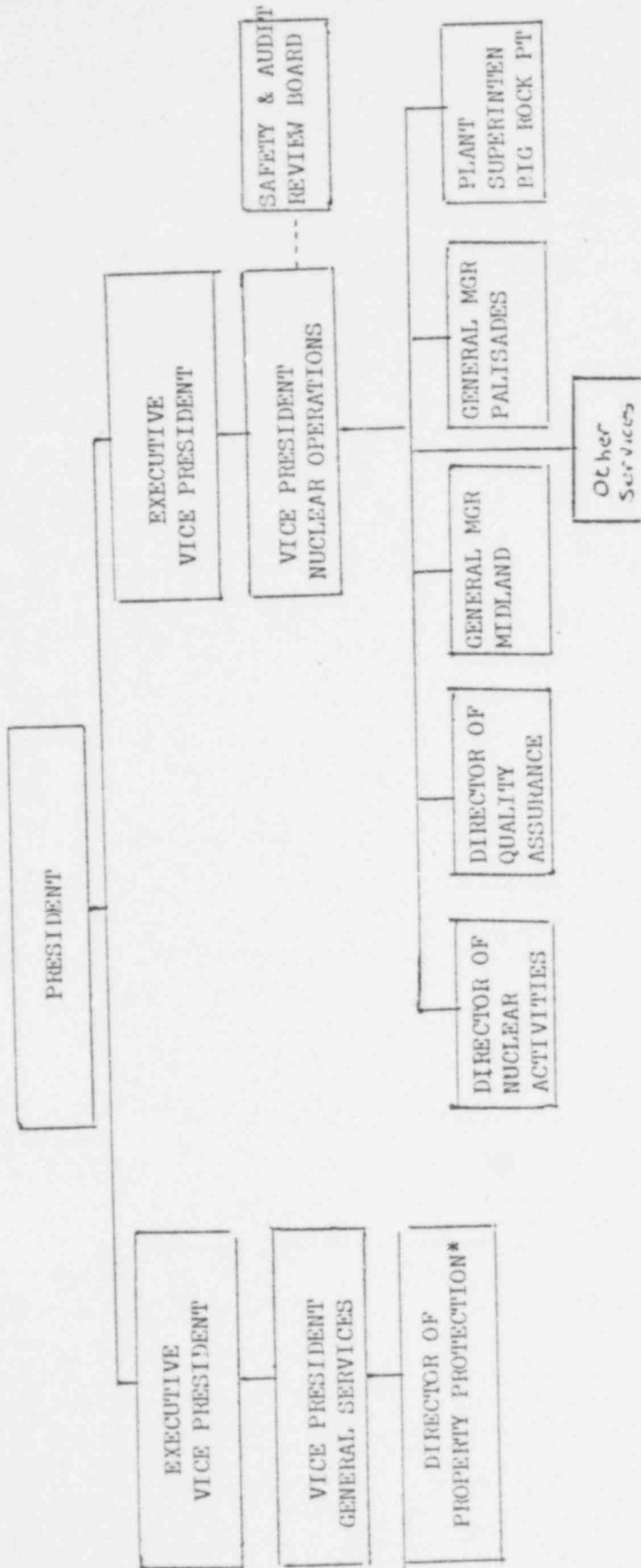
ATTACHMENT 1

The following proposed changes of the Big Rock Point Plant Technical Specifications result from a corporate realignment of the Consumers Power Energy Supply organization. Technical Specification page changes are attached.

Revision to:

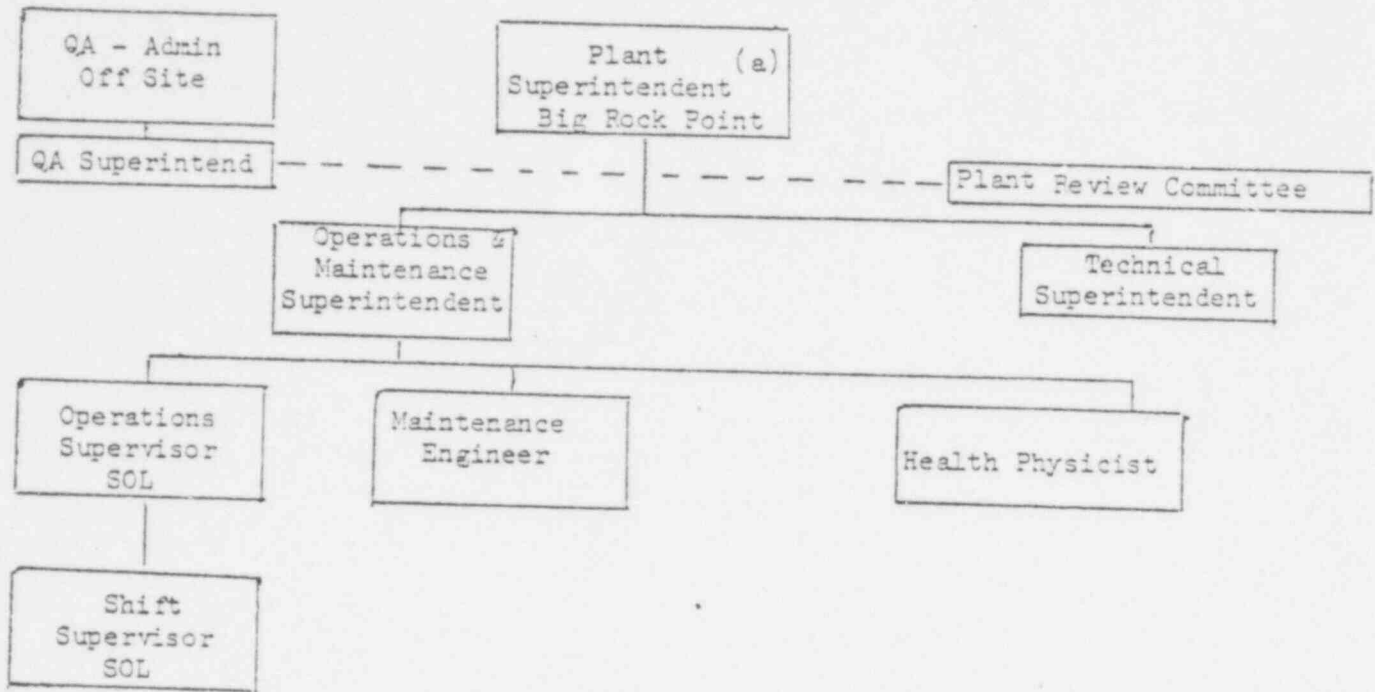
Figure 6.2-1  
Figure 6.2-2  
Section 6.5.1.2  
Section 6.5.1.6.e  
Section 6.5.1.7.c  
Section 6.5.1.8  
Section 6.5.2.1  
Section 6.5.2.3  
Section 6.5.2.4  
Section 6.5.2.9  
Section 6.5.2.10  
Section 6.5.2.11.a  
Section 6.5.2.11.b  
Section 6.5.2.11.c  
Section 6.6.1.b  
Section 6.7.1.b  
Section 6.7.1.d

CONSUMERS POWER COMPANY  
OFF-SITE ORGANIZATION



\*Responsible for overall  
Fire Protection Program

CONSUMERS POWER COMPANY  
Plant Organization



A. Qualified Personnel (as identified in ANSI N18.7-1976/ANS 3.2) will be assigned by the Plant Superintendent to the following areas:

1. Nuclear Power Plant Mechanical, Electrical and Electronic Systems
2. Nuclear Engineering
3. Chemistry and Radiochemistry
4. Radiation Protection (reports to the Health Physicist)

A single individual may be qualified and perform in more than one discipline.

B. The Security Force will be supervised as described in the Plant Security Plan.

C. Quality Control Activities will be in accordance with the Consumers Power Quality Assurance Program Policies.

(a) Responsible for the Plant Fire Protection Program.

(SOL-Senior Operator Licensee)

Figure 6.1-2

6.4 TRAINING

6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Plant Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR, Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Plant Training Coordinator and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

6.5.1.1 The Plant Review Committee (PRC) shall function to advise the Plant Superintendent on all matters related to nuclear safety.

6.5.1.2 COMPOSITION

The PRC shall be composed of the:

- Chairman: Plant Superintendent
- Member: **Operations & Maintenance Superintendent**
- Member: Technical Superintendent
  
- Member: Operations Supervisor
- Member: Instrument and Control Supervisor
- Member: Reactor Engineer
- Member: Health Physicist
- Member: Shift Supervisor
- Member: Maintenance Engineer

**POOR ORIGINAL**

6.5.1.3 ALTERNATES

Alternate members shall be appointed in writing by the PRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate in PRC activities at any one time.

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6.5.1 (Contd)

6.5.1.4 MEETING FREQUENCY

The PRC shall meet at least once per calendar month with special PRC meetings as required.

6.5.1.5 QUORUM

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

6.5.1.6 RESPONSIBILITIES

The PRC shall be responsible for:

- a. Review of (1) all procedures required by 6.8 and changes thereto, (2) any other proposed procedures or changes thereto as determined by the Plant Superintendent to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications. A report shall be prepared and forwarded covering evaluation and recommendations to prevent recurrence to the Chairman of the Safety and Audit Review Board (SARB).
- f. Review of plant operations to detect potential safety hazards.
- g. Performance of special reviews and investigations and reports thereon as requested by the Chairman of the SARB.
- h. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Emergency Plan to the Chairman of the SARB.

6.5.1 (Cont'd)

6.5.1.7 AUTHORITY

The PRC shall:

- a. Recommend to the Plant Superintendent written approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide immediate written notification to the Chairman of SARB of disagreement between the PRC and the Plant Superintendent. However, the Plant Superintendent shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

6.5.1.8 RECORDS

The PRC shall maintain written minutes of each meeting and copies shall be provided to the Chairman of SARB, PRC members and alternates.

6.5.2 SAFETY AND AUDIT REVIEW BOARD (SARB)

6.5.2.1 RESPONSIBILITIES

SARB is responsible for maintaining a continuing examination of designated plant activities. In all cases, where a matter is formally considered by SARB, its findings and recommendations are communicated in writing to the Vice President - Nuclear Operations (NO) and other appropriate levels of management. A written charter is prepared and approved by the Vice President - NO which designates the membership, authority and rules for conducting the meetings. Board membership, qualifications, meeting frequency, quorum, responsibilities, authority and records are in accordance with the nuclear plant Technical Specifications and ARB1 N18.7-1972.

6.5.2.2 FUNCTION

The SARB shall function to provide independent review of designated activities affecting safety-related components, systems and structures designated on the plant's Safety-Related Quality List contained in the Consumers Power Company Quality Assurance Program.



## 6.5.2 (Cont'd)

### 6.5.2.3 COMPOSITION AND QUALIFICATIONS

Collectively, the personnel appointed for the SARB by the Vice President - NO shall be competent to conduct reviews and technical audits in the following areas:

- a. Nuclear power plant operations.
- b. Nuclear engineering.
- c. Chemistry and radiochemistry.
- d. Metallurgy.
- e. Instrumentation and control.
- f. Radiological safety.
- g. Mechanical and electrical engineering.
- h. Quality Assurance practices.

An individual appointed to the SARB may possess expertise in more than one of the above specialties. He should, in general, have had professional experience at or above the senior engineer level in his specialty.

### 6.5.2.4 ALTERNATE MEMBERS

Alternate members may be appointed by the Vice President - NO to act in place of members during any legitimate and unavoidable absences including a conflict-of-interest determination. The qualifications of alternate members shall be similar to those members for whom they will substitute.

### 6.5.2.5 CONSULTANTS

Consultants shall be utilized as determined by the SARB members and/or chairman to provide expert advice to the SARB. SARB members are not restricted as to sources of technical input and may call for separate investigation from any competent source.

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6.5.2 (Cont'd)

- b. The status of deficiencies identified by the Quality Assurance Program, including the effectiveness of the corrective actions completed and implemented, at least once every six (6) months.
- 1. Audits of the Security Program required by the "Nuclear Power Plant Security Plan."

6.5.2.9 AUDITS

Audits of safety-related facility activities during operations are performed by the Quality Assurance Department - **NO** in accordance with the policies and procedures of the Consumers Power Company Quality Assurance Program. Quality Assurance audit reports are sent to SARB for review. In addition, technical audits are the responsibility of the Operating Services Department and shall be reviewed by SARB. These technical audits encompass:

- a. The conformance of facility operation to all provisions contained within the Technical Specifications and applicable license conditions at least once per year.
- b. The performance, training and qualifications of the entire facility staff at least once per year.
- c. The facility Site Emergency Plan and implementing procedures at least once per two years.
- d. Any other area of facility operation considered appropriate by SARB or the Vice President - **NO**
- e. The facility Fire Protection Program and implementing procedures at least once per 2 years.
- f. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- g. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.

6.5.2.10 AUTHORITY

SARB shall report to and advise the Vice President - **NO** on those areas of responsibility specified in 6.5.2.8 and 6.5.2.9.

6.5.2.11 RECORDS

Records of SARB activities shall be prepared and distributed as indicated below:

- a. Minutes of each SARB meeting shall be prepared and forwarded to the Vice President - **NO** and each SARB member within fourteen (14) days following each meeting. Minutes shall be approved at or before the next regularly scheduled meeting following distribution of the minutes.
- b. If not included in SARB meeting minutes, reports of reviews encompassed by Section 6.5.2.8 above shall be prepared and forwarded to the Vice President - **NO** within fourteen (14) days following completion of the review.

6.5.2 (Cont'd)

- c. Audit reports encompassed by 6.5.2.9 above, shall be forwarded to the Vice President - NO and management positions responsible for the areas audited within thirty (30) days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken in the event of a reportable occurrence:

- a. The Commission shall be immediately notified pursuant to 6.7 or a report submitted pursuant to the requirements of 6.9.
- b. All events which are required by regulation or Technical Specifications to be reported to the NRC in writing within 24 hours shall be reviewed by the PRC. The results of the PRC review shall be submitted (either by PRC minutes or by separate report) to SARB.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The reactor shall be shut down immediately and not restarted until Commission authorization is received [10 CFR 50.36(c)(1)(1)].
- b. The Safety Limit violation shall be reported immediately to the Commission in accordance with 10 CFR 50.36 and to SARB Chairman or Vice-Chairman.
- c. A report shall be prepared in accordance with 10 CFR 50.36 and 6.9 of this specification. The Safety Limit violation and the report shall be reviewed by the PRC.
- d. The report shall be submitted within 10 days to the Commission (in accordance with the requirements of 10 CFR 50.36) and the SARB Chairman.

6.8 PROCEDURES

- 6.8.1 Written procedures shall be established, implemented and maintained for all structures, systems, components and safety actions defined in the Big Rock Point Quality List. These procedures shall meet or exceed the requirements of ANSI-18.7.