

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 Provisional Operating License DPR-20, Docket 50-255, issued to Consumers Power Company on October 16, 1972, for the Palisades Plant be changed as described in Section I below:

I. Change(s)

- A. All changes relative to the organizational changes are in Attachment 2.
- B. In accordance with Technical Specification 3.20.1.d, Table 3.20.1 has been revised to include four new snubbers which were added during a recent plant shutdown. The revised page is attached.

II. Discussion

- A. On July 11, 1979, Consumers Power Company elected two new Vice Presidents as part of a realignment 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 the Consumers Power Company. In addition to the new Vice President position, each of the Consumers Power Company's major plants (Palisades Plant included) will be headed by a General Manager who will report directly to an officer of the Company.

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

Manager.

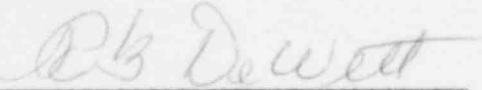
All proposed changes within the text of the Administrative Controls Section (Chapter 6) of the Technical Specifications are consistent with the changes on the organization charts (Figures 6.2-1 and 6.2-2).

- B. The Palisades Plant Technical Specifications Section 3.20.1.d reads, "Snubbers may be added to safety-related systems without prior license amendment to Table 3.20.1 provided that a revision to Table 3.20.1 is included with the next license Amendment request". The additional snubbers were recently added (Reference letter from D P Hoffman to D L Ziemann dated May 16, 1979) and this is Consumers Power Company's next Amendment request.

III. Conclusion(s)

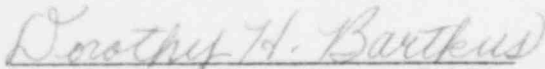
Based on the foregoing, both the Palisades Plant Review Committee and the Safety and Audit Review Board have reviewed these changes and recommend their approval.

CONSUMERS POWER COMPANY



R B DeWitt, Vice President  
Nuclear Operations

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



Dorothy H Bartkus, Notary Public  
Jackson County, Michigan

My commission expires March 26, 1983

545 181

ATTACHMENT 2

The following proposed changes of the Palisades 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 6.1.1  
Section 6.4.1  
Section 6.5.1.1  
Section 6.5.1.2  
Section 6.5.1.6.a  
Section 6.5.1.6.e  
Section 6.5.1.7.a  
Section 6.5.1.7.c  
Section 6.5.2  
Section 6.5.2.2  
Section 6.5.2.3  
Section 6.5.2.8  
Section 6.5.2.9  
Section 6.5.2.10.a  
Section 6.5.2.10.b  
Section 6.5.2.10.c  
Section 6.7.1.b  
Section 6.7.1.d  
Section 6.8.2  
Section 6.8.3.c

## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The General Manager shall be responsible for overall plant operation and shall delegate in writing the succession for this responsibility during his absence.

### 6.2 ORGANIZATION

#### 6.2.1 OFFSITE

The offsite organization for plant management and technical support shall be as shown on Figure 6.2-1.

#### 6.2.2 PLANT STAFF

The plant organization shall be as shown on Figure 6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up (through 15% power), scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. All core alterations after the initial fuel loading shall either be performed by a licensed Reactor Operator under the general supervision of a Senior Reactor Operator or directly supervised by a licensed Senior Reactor Operator (or Senior Operator limited to Fuel Handling) who has no other concurrent responsibilities during this operation.
- f. A fire brigade of at least 3 members shall be maintained on site at all times. This excludes 3 members of the minimum shift crew necessary for safe shutdown or any personnel required for other essential functions during a fire emergency. Either the SAS or CAS operator may be used as a fire brigade member.

### 6.3 PLANT STAFF QUALIFICATIONS

6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.

6.3.2 The Health Physicist shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. (1)

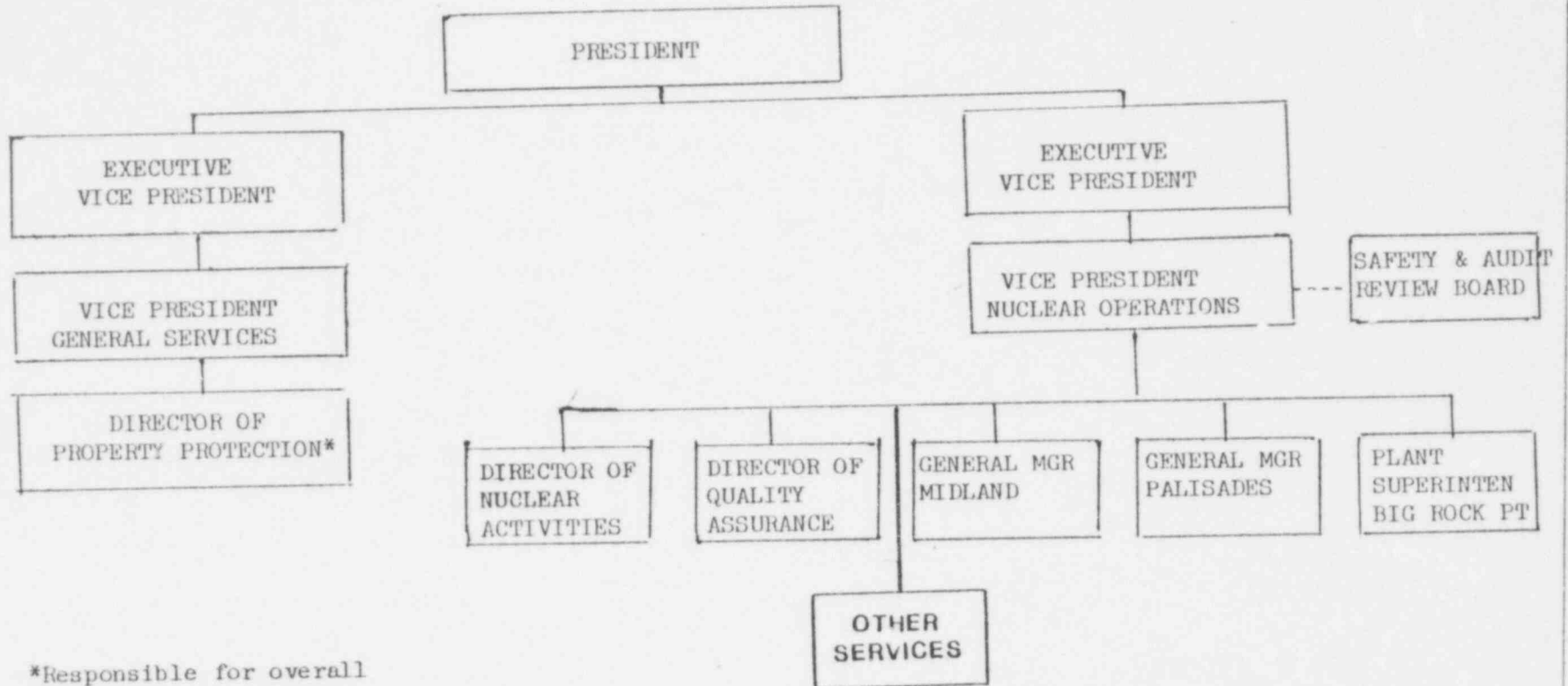
(1) For the purpose of this section "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) Formal schooling in science or engineering, or (b) operational or technical experience/training in nuclear power.

545 183

#### 6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the General Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI W18.1-1971 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, as practical, meet or exceed the requirements of Section 27 of the NFPA Code.

CONSUMERS POWER COMPANY  
OFF-SITE ORGANIZATION



\*Responsible for overall  
Fire Protection Program

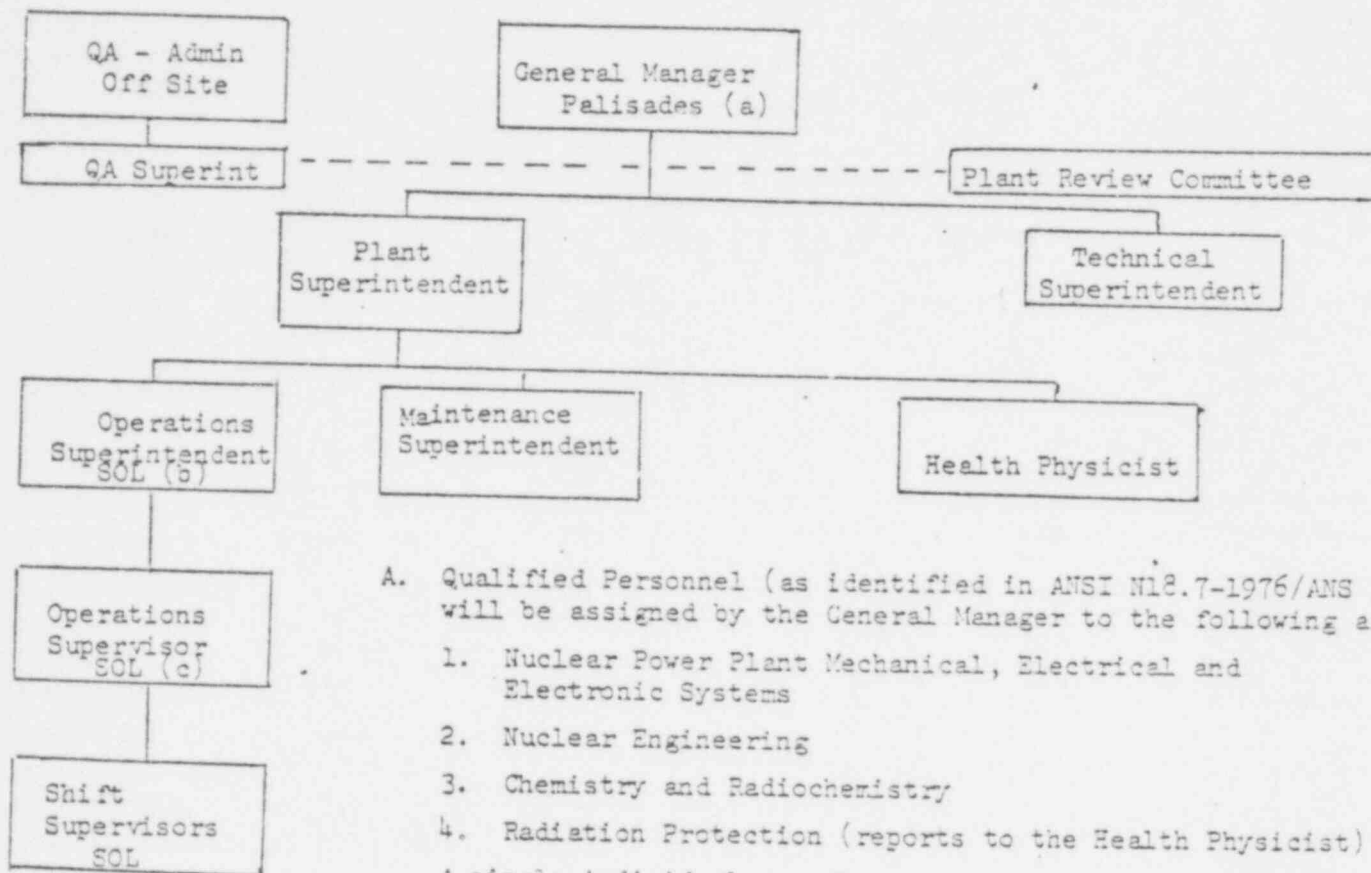
Figure 6.2-1

545 185

THIS PAGE LEFT BLANK INTENTIONALLY

545 186

CONSUMERS POWER COMPANY  
PLANT ORGANIZATION



A. Qualified Personnel (as identified in ANSI N18.7-1976/ANS 3.2) will be assigned by the General Manager 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.
- (b) The Operations Superintendant need not hold an SOL provided he meets the other requirements of 6.3.1 of these Technical Specifications and the position of "Operations Supervisor" is filled. Under these conditions, the Operations Supervisor shall be responsible for directing the activities of licensed operators.
- (c) This position need not be filled if the Operations Superintendant holds an SOL. However, when the Operations Supervisor position is filled, the individual shall hold an SOL.

(SOL - Senior Operator Licensee)

545 187

Figure 6.2-2



6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

6.5.1.1 FUNCTION

The PRC shall function to advise the General Manager on all matters related to nuclear safety.

6.5.1.2 COMPOSITION

The PRC shall be composed of the:

Chairman: General Manager or Designated Alternate  
Member: Plant Superintendent  
Member: Operations Superintendent  
Member: Technical Superintendent  
Member: Maintenance Superintendent  
Member: Plant Instrument and Control Engineer or Supervisor  
Member: Plant Reactor Engineer  
Member: Health Physicist  
Member: Chemical Engineer or Supervisor  
Member: Shift Supervisor (One)  
Member: Senior or General Engineer (One)

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.

6.5.1.4 MEETING FREQUENCY

The PRC shall meet at least once per calendar month with special 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 Specification 6.3 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the General Manager 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 covering evaluation and recommendations to prevent recurrence and forwarded to the Chairman of the Safety and Audit Review Board (SARB).
- f. Review of plant operations to detect potential nuclear safety hazards.
- g. Performance of special reviews, investigations and/or reports thereof as requested by the Chairman of SARB.
- h. Review of all events which are required by NRC Regulations or Technical Specifications to be reported to the NRC within 24 hours.

6.5.1.7 AUTHORITY

The PRC shall:

- a. Recommend to the General Manager 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 un-reviewed safety question.
- c. Provide immediate written notification to Vice President-NO and the Chairman of SARB of disagreement between the PRC and the General Manager. However, the General Manager 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. Copies shall be provided to the Chairman of SARB, PRC members, and alternates.

6.5.2 SAFETY AND AUDIT REVIEW BOARD (SARB)

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. SARB membership, qualifications, meeting frequency, quorum, responsibilities, authority and reports are in accordance with the nuclear plant Technical Specifications and ACRU 110.1.12.

545 189

**POOR ORIGINAL**

#### 6.5.2.1 FUNCTION

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

#### 6.5.2.2 COMPOSITION AND QUALIFICATIONS

Collectively, the personnel appointed for 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 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 speciality.

#### 6.5.2.3 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.

#### 6.5.2.4 CONSULTANTS

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

#### 6.5.2.5 MEETING FREQUENCY

SARB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once every six months thereafter.

6.5.2.3 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 Consumers Power Company's 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 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 two years.

6.5.2.9 AUTHORITY

SARB shall report to and advise the Vice President - NO on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

6.5.2.10 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 approximately two weeks following the meeting. Minutes shall be approved at or before the next regularly scheduled meeting following the distribution of the minutes.
- b. If not included in SARB meeting minutes, reports of reviews encompassed by Section 6.5.2.7 shall be prepared and forwarded to the Vice President - NO within approximately two weeks following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above shall be forwarded to the Vice President - NO and management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 (Deleted)

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated (ref: Sections 2.1 and 2.2):

- a. The reactor shall be shut down until the Commission authorizes resumption of operation (10 CFR 50.36(c)(1)(i)).

545 191

- b. The safety limit violation shall be immediately reported to the Commission (in accordance with 10 CFR 50.36) to the Vice President NC and the SARB Chairman or Vice Chairman.
- c. A report shall be prepared in accordance with 10 CFR 50.36. The safety limit violation and the report shall be reviewed by the PRC.
- d. The report shall be submitted to the Commission (in accordance with requirements of 10 CFR 50.36) and to SARB within 10 days.

## 6.8 PROCEDURES

- 6.8.1 Written procedures shall be established, implemented and maintained covering the activities listed or referenced below:
  - a. The applicable procedure recommended in Appendix "A" or Regulatory Guide 1.33 (November 1972).
  - b. Refueling Operations.
  - c. Surveillance and testing activities of safety-related equipment.
  - d. Emergency plan implementation.
- 6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PRC and approved by the General Manager prior to implementation.
- 6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:
  - a. The intent of the original procedure is not altered.
  - b. The change is approved by two members (or designated alternates) of the PRC, at least one of whom holds a Senior Reactor Operator's license.
  - c. The change is documented, reviewed by the PRC at the next regularly scheduled meeting and approved or disapproved by the General Manager.
- 6.8.4 Written procedures shall be established and maintained covering implementation of the security plan. These procedures and changes thereto shall be reviewed and approved in accordance with Consumers Power Company's Nuclear Power Plant Security Plan.

TABLE 3.20.1 (con't)

Palisades ID Number	System	Location	Snubbers in High Radiation Area During Shutdown*	Snubbers Especially Difficult To Remove	Snubbers Inaccessible During Normal Operation	Snubbers Accessible During Normal Operation
59	MSS	Steam Generator B, Restraint 2-SS-6	X	X	X	
60	MSS	Steam Generator B, Restraint 2-SS-7	X	X	X	
61	MSS	Steam Generator B, Restraint 2-SS-8	X	X	X	
62	SIS	On Low-Pressure Safety Injection Line Inside Containment Before Motor-Oper- ated Valves			X	
63	SIS	Low-Pressure Safety Injection to T-82C			X	
64	SIS	Low-Pressure Safety Injection to T-82C			X	
65	MSS	On EBD-7 Steam to Auxiliary Feed Pump				X
66	SIS	T-82 B to Loop 1 B (Mechanical)	X		X	
67	SIS	T-82 B to Loop 1 B (Mechanical)	X		X	
68	SIS	T-82 D to Loop 2 B (Mechanical)	X		X	
69	SIS	T-82 D to Loop 2 B (Mechanical)	X		X	

\*Modifications to this Table due to changes in high radiation areas should be submitted to the NRC as part of the next license amendment.

545 193