

REGULATORY DOCKET FILE

CONSUMERS POWER COMPANY

Docket No 50-155

Filed with D. 3-8-76

Request for Change to the Technical Specifications

License No DPR-6

I. For the reasons hereinafter set forth, the following changes to the Technical Specifications of License No DPR-6 issued to Consumers Power Company on May 1, 1964 for the Big Rock Point Plant are requested:

A. Remove Page iii, "Contents," and replace it with the following:

	<u>Page No.</u>
7.0 Operating Procedures	7-1
7.1 Deleted	-
7.2 Deleted	-
7.2.1 Deleted	-
7.2.2 Deleted	-
7.2.3 Deleted	-
7.2.4 Administrative and Procedural Controls Relating to High Performance Fuel	7-3
7.3 Normal Operation	7-3
7.3.1 General	7-3
7.3.2 Cold Start-Up After Extended Shutdown	7-3
7.3.3 Hot Start-Up	7-4
7.3.5 Extended Shutdown	7-5
7.3.6 Short Duration Shutdown	7-6
7.4 Refueling Operation	7-6
7.5 Maintenance (Deleted Except for 7.5.7)	7-8
7.6 Operational Testing of Nuclear Safeguard Systems	7-8
7.7 Deleted	-
8.0 Research and Development Program	8-1
8.1 Developmental Fuel Design Features	8-1
8.1.1 Zr-Cr Alloy Test Bundle	8-1
8.1.2 Thin Clad Power Fuel Bundle	8-5
8.2 Principle Developmental Fuel Operating Limitations	8-5
8.2.1 Center Melt Test Fuel Bundles	8-5
9.0 Primary System Surveillance	9-1
10.0 (Section 6.0) Administrative Controls	10-1
6.1 Responsibility	10-1
6.2 Organization	10-1
6.2.1 Off Site	10-1
6.2.2 Plant Staff	10-1
6.3 Plant Staff Qualifications	10-1
6.4 Training	10-5
6.5 Review and Audit	10-5

B. Remove Page 10-2, "Figure 6.2.1, Consumers Power Company Off-Site Organization," and replace it with the following:

Consumers Power Company
OFF-SITE ORGANIZATION

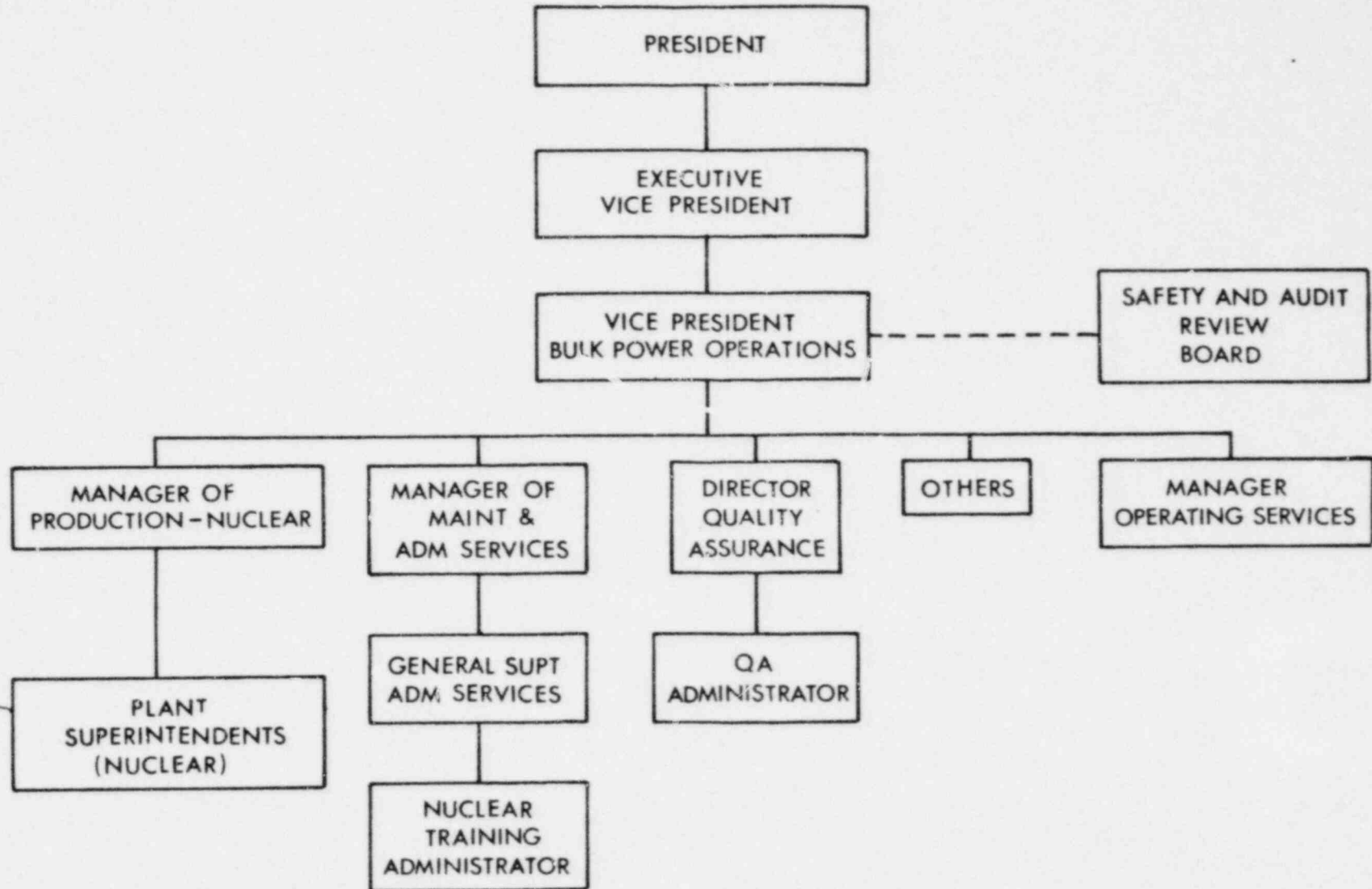
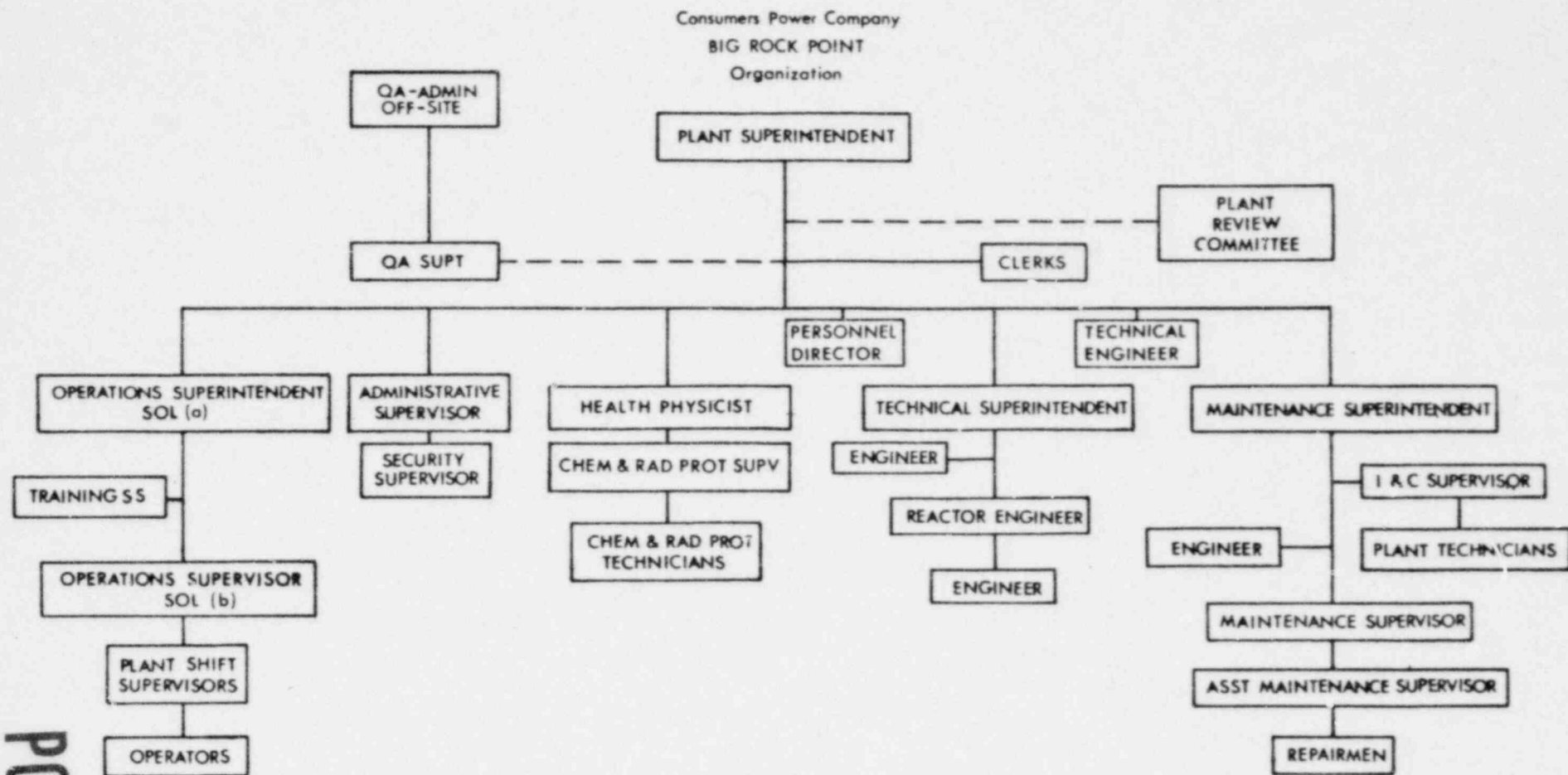


FIGURE 6.2-1
10-2

POOR ORIGINAL

C. Remove Page 10-3, "Figure 6.2-1, Consumers Power Company Big Rock Point Organization," and replace it with the following:

POOR ORIGINAL



SOL - Senior Operator Licensee

(a) The Operations Superintendent need not hold an SOL provided he meets the other requirements of 6.3.1 of these 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.

(b) This position need not be filled if the Operations Superintendent holds an SOL.

FIGURE 6. -1

D. Remove Pages 10-7, 10-8, 10-10 and 10-11 and replace them with the following:

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 Manager of Production, Nuclear and 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 Manager of Production, Nuclear, 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 - Bulk Power Operations (BPO) and other appropriate levels of management. A written charter is prepared and approved by the Vice President - BPO which designates the membership, authority and rules conducting the meetings. Board membership, qualifications, meeting frequency, quorum, responsibilities, authority and records are in accordance with the nuclear plant Technical Specifications and ANSI 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 - BPO 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 - BPO 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.

6.5.2 (Cont'd)

- h. 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.
- i. 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 - BPO 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 Technical 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 -- BPO.

6.5.2.10 AUTHORITY

SARB shall report to and advise the Vice President - BPO 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 - BPO 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 - BPO 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 - BPO 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 and the Manager of Production, Nuclear.

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)(i)].
- b. The Safety Limit violation shall be reported immediately to the Commission in accordance with 10 CFR 50.36, the Manager of Production, Nuclear 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), SARB Chairman and the Manager of Production, Nuclear.

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.

E. Remove Table 6.2-1, "Minimum Shift Crew Composition," and replace it with the following:

TABLE 6.2-1

Minimum Shift Crew Composition

The minimum shift crew shall be as follows except when plant conditions specified in paragraph (a) or (b) below have been established (see note (1) below) or when an unexpected absence occurs (see note (2) below):

1 Shift Supervisor - SOL

1 Operator - OL

2 Operators - Nonlicensed

(a) Cold Shutdown

1 Shift Supervisor - SOL

1 Operator - OL

1 Operator - Nonlicensed

(b) Refueling Operations (See note (2) below)

1 Shift Supervisor - SOL

1 Operator - OL

2 Operators - Nonlicensed

SOL - Senior Operator Licensed in accordance with 10 CFR 55.

OL - Operator Licensed in accordance with 10 CFR 55.

- (1) During control rod motion associated with reactor start-up (to a power level \geq 5 percent), one licensed Operator shall observe the control rod manipulation to ensure established control rod withdrawal procedures are adhered to.
- (2) Does not include additional personnel required when core alterations are being conducted. See 6.2.2.e.

II. Discussion

A. Changes to the Index

Page iii of the index utilized in the development of the Administrative Control Technical Specifications issued December 19, 1975 did not reflect previous changes made in Section 8 of the Technical Specifications. On December 18, 1970 Consumers Power Company requested a significant change in Section 8 of the Big Rock Point Technical Specifications. Technical Specifications Change No 22, approved by the NRC February 29, 1971, approved significant changes in Section 8. The change in the index proposed in this change merely updates the index to be consistent with the February 9, 1971 Technical Specifications change.

B. Management Organization

At the time of the issuance of the December 19, 1975 Administrative Control Technical Specifications, the Consumers Power Company organization contained a Vice President - Bulk Power Operations and an Executive Manager - Bulk Power Operations. On January 1, 1976 Mr R. A. Lamley retired from Consumers Power Company. Mr C. R. Bilby, formerly Executive Manager - Bulk Power Operations, was appointed to Vice President - Bulk Power Operations to replace Mr Lamley. At present, Consumers Power Company does not plan to fill the slot vacated by Mr Bilby. Thus, Figure 6.2-1 and Pages 10-7, 10-8, 10-10 and 10-11 have been appropriately revised to reflect this organization change.

C. Big Rock Point Organization Change

A position of Operations Supervisor has been created in order to lighten the workload on the Operations Superintendent. This position is reflected on the Big Rock Point Organization Chart included in this proposed change. In addition, provision has been made such that a licensed Senior Reactor Operator is required to directly supervise the shift supervisors.

D. Change in PRC Authority

A typographical error apparently occurred in Section 6.5.1.7(b) on Page 10-7. The Standard Technical Specifications and the Palisades Plant Technical Specifications require PRC to 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. The Technical Specifications issued for the Big Rock Point Plant December 19, 1975 contained a similar requirement except that "e" was replaced with "f." We believe this was a typographical error and request that it be changed to "e."


E. Minimum Operating Crew Complement

The new Administrative Control Technical Specifications require that one Senior Licensed Operator, two Licensed Operators and two Nonlicensed


III. Conclusions

Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have concluded that this proposed Technical Specifications Change does not involve an unreviewed safety question.

CONSUMERS POWER COMPANY

By 
C. R. Bilby, Vice President

Sworn and subscribed to before me this 8th day of March 1976.


Sylvia B. Ball, Notary Public
Jackson County, Michigan
My commission expires May 18, 1976.

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FROM: Consumers Power Co.
Jackson, Michigan 49201
Ralph B. Sewell

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3-8-76

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ENCLOSURE Request for Change to the Tech Specs for Lic. DPR-6 notarized 3-8-76 to reflect changes in General Office & plant staff organization 1& to propose minor changes & corrections to Tech Specs....

(3 Orig & 37 CC rec'd)

PLANT NAME: ~~XXXXXXXXXXXX~~ Big Rock Pt. Plant

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SAFETY

FOR ACTION/INFORMATION

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PROJECT MANAGER: Reeves
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