



Consumers
Power
Company

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

May 17, 1977

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Director of Nuclear Reactor Regulation
Att: Mr Don K Davis, Acting Branch Chief
Operating Reactor Branch No. 2
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-155, LICENSE DPR-6 -
BIG ROCK POINT PLANT - T/S CHANGE:
HEALTH PHYSICIST MIN QUAL

Transmitted herewith are three (3) original and thirty-seven (37) conformed copies of a request for a Technical Specifications change to Docket 50-155, License DPR-6.

The purpose of this submittal is to incorporate the minimum qualification requirements of the Radiation Protection Manager (Health Physicist or the Chemistry and Radiation Protection Supervisor) into the Technical Specifications, as requested by Mr Ziemann's letter dated March 15, 1977.

David A Bixel
Nuclear Licensing Administrator

CC: JGKepler, USNRC

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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 Provisional Operating License DPR-6, Docket 50-155, be changed as described in Section I below:

I. Change

A. Add Section 6.3.2 as follows:

"6.3.2 Either the Health Physicist or the Chemistry and Radiation Protection Supervisor 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.

Note: See attachment for proposed page change.

II. Discussion

This proposed Technical Specifications addition is submitted in accordance with Mr Ziemann's recommendation dated March 15, 1977.

In discussions with your staff concerning the implementation of Regulatory Guide 1.8, the requirement that the Radiation Protection Manager (Health Physicist) "...should have a bachelor's degree or equivalent in a science or an engineering subject..." was addressed. It is Consumers Power Company's position that the equivalency to a bachelor's degree is a minimum of four years operational or technical experience/training in nuclear power, and specifically for the Health Physicist, in radiological protection and controls. This interpretation will allow highly competent technicians without bachelor's degrees to assume the position of Health Physicist as long as the other requirements of Regulatory Guide 1.8 are met.

The submission of this Technical Specifications change request is based upon the understanding that this interpretation is acceptable.

III. Conclusion

Based on the foregoing, the Big Rock Point Plant Review Committee has concluded that this change does not involve an unreviewed safety question.

CONSUMERS POWER COMPANY

By CR Bilby
C R Bilby, Vice President
Production & Transmission

Sworn and subscribed to before me this 17th day of May 1977.

Sylvia B Ball
Sylvia B Ball, Notary Public
Jackson County, Michigan
My commission expires April 13, 1980.