



Consumers
Power
Company

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November 3, 1982

Harold R Denton, Director
Office of Nuclear Reactor Regulation
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND NUCLEAR COGENERATION PLANT
MIDLAND DOCKET NOS 50-329, 50-330
PROPOSED ORGANIZATIONAL MODIFICATION
OF THE NUCLEAR ACTIVITIES DEPARTMENT
FILE: 0505.813 SERIAL: 19400

Reference: July 20, 1982 Letter to H R Denton from J W Cook, Serial 17966

Meetings were held between Consumers Power Company (CP Co) and the NRC Staff on October 14 and 20, 1982 to discuss the Independent Safety Engineering Group (ISEG) concept described in NUREG-0737, Item I.B.1.2. This item is presently listed as confirmatory on the Midland docket. As a result of these meetings, CP Co is sending this letter to clarify the information submitted in the reference letter to H R Denton.

Attached is a revised copy of Appendix A, Organization Modifications of the Nuclear Activities Department and the revisions to Appendix B, Draft Technical Specifications as changed from the reference letter to H R Denton. The Draft Technical Specification sheets enclosed have been revised in general.

The Nuclear Activities Plant Organization (NAPO) described in Appendices A and B will be in place with standards and procedures at least 90 days prior to fuel load.

A submittal similar to Appendix A will also be included with the Big Rock Point and Palisades technical specification change requests which will be entered on their respective dockets for NRC approval under separate cover. The response to NUREG-0737, I.B.1.2, in the Midland FSAR will be updated to address the modified organization after NRC approval is received.

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This letter should provide the information needed to close the ISEG issue on the Midland docket.

James W. Cook

JWC/KJT/jvm

CC DSBrinkman, US NRC
RJCook, Midland Resident Inspector
RHernan, US NRC
DBMiller, Midland Construction (3)
RWHuston, Washington
JMPeschel, US NRC Region 3

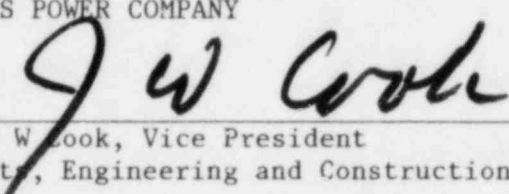
CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 19400 Dated November 3, 1982


At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits additional information pertaining to the Independent Safety Engineering Group concept described in NUREG-0737, I.B.1.2.

CONSUMERS POWER COMPANY

By


J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 8 day of November, 1982


Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984

APPENDIX A

ORGANIZATIONAL MODIFICATION
OF THE NUCLEAR ACTIVITIES DEPARTMENT

APPENDIX AOrganizational Modification of the Nuclear Activities Department

CP Co proposes to modify its organization by creating a new department titled Nuclear Activities Plant Organization (NAPO) and broadening the responsibilities of the Plant Review Committee (PRC) and Safety and Audit Review Board (SARB, which will be renamed the Nuclear Safety Board - NSB). This new organization will involve the General Office and all three CP Co nuclear power plant sites (Midland, Palisades and Big Rock Point). NAPO will perform or assure that the Independent Safety Engineering Group (ISEG) functions described in NUREG-0737, Item I.B.1.2, will be accomplished. The details of how this will be accomplished will be contained in a procedure or standard that will be available 90 days before fuel load. NAPO will be responsible to report to the NSB on significant issues and findings. Integrating these functions in this coordinated manner will improve the overall safety of the plant through more effective utilization of experienced personnel.

The NAPO group will perform independent safety appraisals, perform plant trending and safety reviews on request, and act as a technical resource to the PRC and NSB. This will result in elevating the PRC and NSB from a level of issue identifiers to one of issue resolvers and also allow the senior and experienced managers who serve on these committees to better utilize their talents addressing key safety issues. In addition, the full-time availability of NAPO will permit safety reviews to be conducted in more detail than is now possible using part-time PRC members.

The Vice-President of Nuclear Operations, Executive Director of Nuclear Activities and Plant Managers can request NAPO to provide specialized technical support for problem resolution or General Office interface. NAPO will also interface with QA but not become an integral part of that organization. At present, CP Co does not plan on integrating STA's into the NAPO group but certain review functions may require STA interaction.

Since NAPO will be a single entity, individuals with a specific expertise will be available to support reviews at all sites regardless of their permanent home location. This will promote a transfer of information between the sites. It is now projected that the ultimate staffing for the NAPO group will be approximately 10 professional people at Midland, 8 at Palisades, 1 at Big Rock Point and 3 in the General Office. There will also be additional technical/secretarial help to assist them. NAPO will report off-site to the Vice President of Nuclear Operations through the Executive Director of Nuclear Activities and is therefore independent of direct line responsibility for operating the plant. Independence from plant management will be fostered by development of career paths not dependent on plant management. NAPO will increase the available technical expertise located at the plant sites and permit additional systematic assessment of plant activities.