

DEC 13 1982

Docket Nos. 50-329
50-330

APPLICANT: Consumers Power Company

FACILITY: Midland Plant, Units 1 and 2

SUBJECT: SUMMARY OF MEETINGS HELD WITH CONSUMERS POWER ON INDEPENDENT
SAFETY ENGINEERING GROUP -- OCTOBER 14, 1982 AND OCTOBER 20,
1982

On October 14 and October 20, 1982, the NRC staff met in Bethesda, Maryland with Consumers Power Company and the Summit Nuclear Resources (10/20 meeting only) to discuss the Consumers Power Company's proposal to establish an Independent Safety Engineering Group for the Midland Plant as required by NUREG-0737, Item I.B.1.2. This subject relates to section 13.4.5 of the Midland SER and was listed as Confirmatory Item No. 26 in that document. A list of meeting attendees is included as Enclosure 1.

SUMMARY

The applicant is required by Item I.B.1.2 of NUREG-0737 to establish an Independent Safety Engineering Group (ISEG) at or for the Midland Plant prior to fuel load. The Midland SER stated that the applicant would propose an organization encompassing the ISEG concept as an alternative to the ISEG, per se. By letter dated July 20, 1982, Consumers Power submitted their proposal which described an organization which would be called the Nuclear Activities Plant Organization or NAPO. This organization would provide a number of safety review functions for all three nuclear plants owned by Consumers Power (Palisades, Big Rock Point and Midland). The proposal included a description of the proposed organization as well as draft technical specifications for the Midland Plant. Following a preliminary evaluation by the staff (Region III lead), a meeting was called for October 14, 1982 to discuss details with the applicant. A second meeting on October 20, 1982 was necessary to allow the applicant to respond to staff concerns.

The staff's major concern was whether those personnel within the proposed NAPO organization performing ISEG functions would have the degree of independence intended by the NUREG-0737 requirement. The proposal would have had those personnel performing functions presently assigned to the on-site Plant Review Committee (PRC) and the off-site (or corporate) Nuclear Safety Board. The NUREG-0737 requirement states "the new ISEG shall not replace the plant operations review committee..." and "ISEG...shall not be responsible

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for sign-off functions such that it becomes involved in the operating organization." The staff considered that the NAPO, as proposed, did not meet the independence concept by virtue of the organizational structure and charter.

The staff also had concerns regarding the number of equivalent full-time persons with NAPO who would be assigned ISEG functions, whether the assignments would be rotated or permanent and how many of these people would be degreed engineers (or equivalent).

The staff also had concerns regarding the possibility that the NAPO (ISEG) function may replace audit functions intended to be performed by the Quality Assurance Department.

During the second meeting, a number of agreements were reached including a commitment by Consumers Power to revise and resubmit the organization description and draft technical specifications in order to allay the staff's concerns. The cognizant staff reviewer (J. Peschel) agreed to provide prompt review and feedback on the proposed revisions to the technical specification wording. A revised submittal was expected in early November 1982.

Ronald W. Hernan
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Enclosure:
As stated

cc: See next page

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October 14, 1982 and October 20, 1982

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Summit Nuclear Resources

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MEETING SUMMARY DISTRIBUTION

Docket No(s):

NRC/PDR

Local PDR

NSIC

PRC System

LB #4 r/f

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