

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 the Facility Operating License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964, for the Big Rock Point Plant be changed as described in Section I below:

I. Changes

- A. Add Section 6.1.2 to read:

"The Shift Supervisor shall be responsible for the shift command function. A Management directive to this effect shall be issued by the Vice-President, Nuclear Operations."

- B. Add an asterisk to the end of item d. of Section 6.2.2. The footnote at the bottom of page i03 should be revised to read:

"\*Radiation Protection coverage and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accomodate unexpected absence provided immediate action is taken to restore the minimum requirements."

- C. The second sentence of Section 6.2.2, item f., should be revised to read:

"The Fire Brigade shall not include 2 members. . ."

- D. Add item g. to Section 6.2-2.

- E. Replace Figure 6.2-2 with revised Figure 6.2-2, "Plant Organization"

- F. Replace Table 6.2-1 with revised Table 6.2-1, "Minimum Shift Crew Composition".

- G. Revise Section 6.4.1 to read as follows:

"A retraining and replacement training program for the plant staff shall be maintained under the direction of the Director of Nuclear Operations Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR 55, Appendix "A"."

- H. Revise Section 6.4.2 to read as follows:

"The Director of Property Protection is responsible for the development, revision, approval and implementation of the Fire

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Brigade training program. This training shall, as practicable, meet or exceed the requirements of Section 27 of the NFPA Code-1975. Fire Brigade training drills shall be held at least quarterly."

- I. Reformat all of Section 6.9.
- J. Delete item h. of Section 6.10.1 and reletter items i. and j.
- K. Revise item j. of Section 6.10.2 to read:  

"Records of meetings of the PRC and NSB."
- L. Add item l. to Section 6.10.2 to read:  

"Records of training and qualification for members of the Plant Staff." This item shall be qualified in Section 6.10.2 with the footnote "Effective as of December 31, 1982".
- M. Add Section 6.12, "High Radiation Area".

Revised Technical Specifications pages are attached. Proposed changes are shown by a vertical line in the right hand margin.

## II. Discussion

The above proposed Technical Specifications changes are requested in order to clarify existing requirements, to achieve closer conformance to the Standard Technical Specifications and to bring the Big Rock Point Technical Specifications into closer agreement with our Midland Plant and/or Palisades Technical Specifications. The following describes the proposed changes:

### Item A

Section 6.1.2 has been added to meet the intent of the Standard Technical Specifications.

### Item B

A footnote has been added to conform to the Standard Technical Specifications.

### Item C

This change is editorial only.

### Item D

This section has been added to incorporate the revised working hour guidelines as prescribed by NRC Generic Letter 82-12 dated June 15, 1982. The administrative procedures addressed by this section, however,

are applicable only to plant staff who perform safety-related operation functions. Consumers Power Company stated in our letter dated December 19, 1980, that no formal procedure will address overtime for the I&C technicians, key maintenance personnel or the health physicists. Nevertheless, they will be included in our overall efforts to limit overtime. The NRC, by letter dated February 4, 1982, found Consumers Power Company's commitments to NUREG-0737, Item I.A.1.3(1), Shift Manning, and our program for implementing these commitments to be acceptable.

#### Item E

The following changes have been made to Figure 6.2-2:

- A. The addition of the QC Supervisor.
- B. The title "Plant Health Physicist" is no longer used at Big Rock Point and the individual is now classified as the Chemistry and Health Physics Superintendent.
- C. The acronym SOL (Senior Operator Licensee) is replaced by SRO (Senior Reactor Operator).
- D. Item C is revised to reflect the new QA/QC policy document.

#### Item F

Table 6.2-1 has been reformatted to conform to the Standard Technical Specifications. A second Auxiliary Operator has been added to the shift crew when the plant is in a power or refueling operation to substitute for the STA and requirements for dealing with the absence of an on-duty shift crew member have also been added.

#### Item G

This section has been revised to provide single point responsibility for retraining and replacement training programs. This section conforms to the proposed Palisades Technical Specifications.

#### Item H

This section has been revised to make it consistent with Consumers Power Company's Fire Plan in addition to the Standard Technical Specifications.

#### Item I

Section 6.9 has been reformatted to make it consistent with the Standard Technical Specifications. The new format for Section 6.9 involves the use of new subsection numbers instead of letters. Although this section may appear differently, no content changes have been made.

Items J and L

Changes are requested in order to conform to the Standard Technical Specifications.

Item K

As was proposed in Consumers Power Company's November 12, 1982 submittal, the Safety and Audit Review Board (SARB) is to be renamed the Nuclear Safety Board (NSB).

Item M

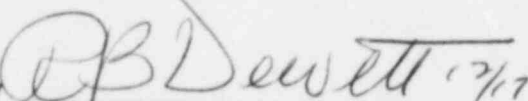
This proposed change conforms with the Standard Technical Specifications for entry into high radiation areas and is consistent with our Palisades and Midland Plant Technical Specifications.

III. Conclusion

Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have reviewed these changes and find them acceptable.

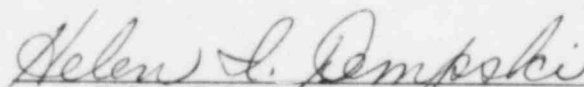
CONSUMERS POWER COMPANY

By

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R B DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 17th day of December 1982.



Helen I Dempski, Notary Public  
Jackson County, Michigan

My commission expires December 14, 1983.