UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
WASHINGTON, D. C. 20555

May 17, 1982

MEMORANDUM FOR: ACRS Members

FROM: for David C. Fischer, Reactor Engineer

SUBJECT: MIDLAND PLANT SAFETY REVIEW GROUPS

The Consumers Power Company (CPCo), which will have its application to operate Midland Plant Units 1 & 2 reviewed by the full ACRS in June 1982, intends to implement a coordinated approach for satisfying safety review requirements at Big Rock Point, Palisades, and Midland.

CPCo acknowledges the extremely high workload on the three Plant Review Committees (PRC's) and the fact that required supplemental reviews cause this workload to cascade throughout the review process. CPCo is concerned that the magnitude of the workload and the composition of the review committees (senior line managers) might combine to detract from the quality of safety reviews, the effectiveness of plant management, or both.

The proposed new scheme involves creation of a new department titled the Nuclear Activities Department Onsite (NADO). This new department will be headed by an Executive Engineer. The Executive Engineer will report to the VP of Nuclear Operations through the Executive Director of Nuclear Activities. A small Staff will support the Executive Engineer at the General Office plus there will be a Staff at each of the three plants reporting to the Executive Engineer (the size of the plant based staff will vary from plant to plant). The Company's safety review organization also includes the Nuclear Safety Board (NSB) (offsite review committee) and the PRC (onsite review committee) at each plant.

CPCO's intention is to permit the NADO Staff onsite to act as a technical resource to the PRC performing safety reviews on request and relieving PRC of responsibility for handling routine matters such as event reporting (the PRC Chairman's concurrence in the results of these reviews will be required). This group will also perform independent safety appraisals, trend plant performance, and generally perform those functions called out in TMI Action Plan, NUREG-0737, Item I.B.1.2. (Independent Safety Engineering Group (ISEG) requirement). The group reports offsite and is thus independent of direct line responsibility for operating the plant although total independence from operating pressures is recognized to be difficult to attain in a utility.

The NADO Staff will also serve as a technical resource to the NSB. Since the Department will be a single entity, individuals with specific resources would be available to support NSB reviews at all plants regardless of their permanent "home" location.

CPCo believes that providing this resource for PRC and NSB will serve two purposes. First it will elevate the review committees from a level of issue identifiers to one of issue resolvers. Key safety issues could thus be addressed more effectively, better utilizing the talents of the senior and experienced managers who serve on these committees. Secondly, the full time availability of NADO would permit safety reviews to be conducted in more detail than is now possible using part time PRC members.

I would like to point out that the projected staffing for the NADO organization at each location is:

Midland	10
Palisades	10
Big Rock Point	1

[Recall, that operating plants are not currently required to have an ISEG.] Noting that Big Rock Point has a Continuing Risk Management Program (CRIMP) staffed by 3 people which functions sort of like an ISEG, one NADO person onsite might be appropriate. At any rate, the 3 CRIMP people basically manage Big Rock's ongoing PRA. It might be interesting to have Midland address how its PRA will influence the composition of its' NADO Staff.

Familiarity with Midland's safety review organization will assist you in your review during both the May 20-21 Subcommittee and June full Committee meetings.

Attachment:
CPCo Summary of May 4, 1982 Meeting re
Midland's approach to safety review.

cc: R. Fraley
M. Libarkin
J. McKinley
K. Kirby
ACRS Consultants:

P. Davis	P. Pomeroy
E. Epler	R. Scavuzzo
W. Lipinski	M. Trifunac
F. Parker	Z. Zudans

MEETING SUMMARY
May 4, 1982
Bethesda, Maryland

A meeting was held between Consumers Power Company (CPCo) and the NRC Staff in Bethesda on May 4, 1982. The meeting was held at the request of CPCo to permit a discussion of our overall approach to safety review. This plan encompasses NUREG-0737, Item I.B.1.2, "Independent Safety Engineering Group" as well as the onsite and offsite review committees required by Technical Specifications. CPCo intends to implement a coordinated approach to the safety review function involving all three plants, Big Rock Point, Palisades, and Midland.

The CPCo presentation was made by David Bixel; slides used during the presentation are attached as Enclosure 1. Prior to the meeting, draft portions of Section 6, "Administrative Controls" of the Midland Technical Specifications and a table comparing them to the current B&W Standard Technical Specifications (NUREG-0103, Revision 4) had been provided for informal review by the Licensee Qualification Branch. The portions provided were those which would relate to the proposed new safety review policy; similar Technical Specifications would be required at each of the other plants. Minor differences may exist in the final Technical Specifications for the three plants due to plant unique features or differing basic requirements, but the Midland draft adequately describes the organizational structure and review requirements. The Midland draft specifications are attached as Enclosure 2. The attendees are listed in Enclosure 3.

CPCo was motivated to reevaluate its safety review policy by three principal factors. First was the Regulatory Improvement Program currently underway at Palisades, second was a perception of a significant increase in workload for the offsite review board associated with Midland, and last was a study conducted by Management Analysis Corporation (MAC). A major finding of the study was that the Plant Review Committees (PRC's) carried an extremely high workload, and that required supplemental reviews caused this workload to cascade throughout the review process. CPCo was concerned that the magnitude of the workload and the composition of the review committees (senior line managers) could combine to detract from the quality of safety review, the effectiveness of plant management, or both.

The proposed new scheme involves creation of a new department titled Nuclear Activities Department Onsite (NADO) headed by an Executive Engineer (Mr. Bixel). This department will report to the VP of Nuclear Operations through the Executive Director of Nuclear Activities. The NADO organization chart is included in Enclosure 1. It details a small Staff supporting Mr. Bixel at the General Office and a Staff at each of the three plants reporting to Mr. Bixel (the size of this Staff varies as discussed below). The Company safety review organization also includes the Nuclear Safety Board (NSB) (offsite review committee) and the PRC (onsite review committee) at each plant.

The intention of this organization is to permit the NADO Staff on site to act as a technical resource to the PRC performing safety reviews on request and relieving PRC of responsibility for handling routine matters such as event reporting (the PRC Chairman's concurrence in the results of

these reviews would be required as detailed in the draft Technical Specifications). This group would also perform independent safety appraisals, trend plant performance, and generally perform those functions called out in Item I.B.1.2. The group reports offsite and is thus independent of direct line responsibility for operating the plant although total independence from operating pressures is recognized to be difficult to attain in a utility.

The NADO Staff would also serve as a technical resource to the NSB. Since the Department would be a single entity, individuals with specific resources would be available to support NSB reviews at all plants regardless of their permanent "home" location.

Providing this resource for PRC and NSB serves two purposes. First it elevates the review committees from a level of issue identifiers to one of issue resolvers. Key safety issues can thus be addressed more effectively, better utilizing the talents of the senior and experienced managers who serve on these committees. Secondly, the full time availability of NADO will permit safety reviews to be conducted in more detail than is now possible using part time PRC members.

The Staffing targets for the NADO organization at each location are detailed in Enclosure 1. At Midland and Palisades ultimate Staffing will be approximately 10 while at Big Rock Point the NADO group will be a single individual. The reasons for this are twofold. First, Big Rock is a small and simple plant with relatively few procedures, systems, and modification; it is a relatively mature facility where the number of future modifications/operational changes is expected to be low. Second, an independent safety group already exists in the form of the Continuing Risk Management Program (CRIMP); this group consists of three personnel and reports to the Reactor Engineering Department in Jackson. Their purpose is to utilize risk assessment techniques to evaluate plant performance, proposed modifications, and operating experience using the existing PRA as a tool. The reporting relationship of the CRIMP group will not be changed, but it will be expected to work closely with the NADO representative and assist in the technical resource aspects of the NADO function.

what will happen w/c Midland P.. is done?

Fred Buckman, Executive Director of Nuclear Activities, emphasized that this plan can only work if it is implemented company wide. Its organization provides career paths which will tend to enhance the psychological independence of department members. Approval of this concept at less than all three plants would damage this as well as create an untenable situation in so far as offsite review requirements would differ for each plant. NRC insistence on a five member NADO group at Big Rock Point would also require that the plan be abandoned as too costly considering the existing CRIMP program to which the company has already committed. CPCo's intent at this meeting was to obtain agreement in principle prior to finalizing the program and submitting implementing Technical Specifications changes for Big Rock Point and Palisades and proposed Technical Specifications for Midland.

The NRC Staff questioned organizational structure, independence, and operating procedures quite extensively. Most of this discussion is

reflected in the summary paragraphs above. Specific issues not addressed above include:

- control of NADO activities would be exercised by the NSB and NADO would be expected to report to the NSB at regular intervals (approximately quarterly) regarding ongoing safety evaluations, problems identified, etc.

- independence from plant management will be fostered by development of career paths not dependent on plant management and by personnel selection.

The Staff indicated a general acceptance of the concept and encouraged a prompt submittal of the necessary Technical Specification changes for Big Rock Point and Palisades. LQB anticipates no difficulty in handling this as a package for all three plants. It was noted, however, that ISEG is a requirement for NTOL plants like Midland. The Staff is willing to propose this program to the Director of NRR as an alternative since it is company wide and encompasses the ISEG role and philosophy. The Staff cautioned, however, that they cannot guarantee a favorable response from the Director and it is possible that some additional aspects could be added to the Midland Technical Specifications to explicitly cover all ISEG requirements.

CPCo agreed to submit the necessary Technical Specifications changes in the near future.

ENCLOSURE 1

IN RESPONSE TO THE NEED FOR
REGULATORY IMPROVEMENT

AND

BASED ON THE SAFETY MANAGEMENT
ASSESSMENT CONDUCTED BY MANAGEMENT
ANALYSIS COMPANY (MAC) AND CONSUMERS
POWER COMPANY (CP CO) IT WAS CONCLUDED

THAT

BOTH A MORE EFFECTIVE AND EFFICIENT
REVIEW PROCESS COULD BE DEVELOPED

MAJOR CONCERNS WITH PRESENT ORGANIZATION

- THE REVIEW WORKLOAD OF THE PLANT REVIEW COMMITTEES (PRC) PLACES AN UNACCEPTABLE BURDEN ON TOP LEVEL PLANT MANAGEMENT

- THE REVIEW WORKLOAD OF THE SAFETY AND AUDIT REVIEW BOARD (SARB) PLACES AN UNACCEPTABLE BURDEN ON TOP LEVEL NUCLEAR OPERATIONS DEPARTMENT MANAGEMENT

- SOME REVIEWS BEING CONDUCTED ARE NOT AS CONSISTENTLY THOROUGH AS DESIRED

- RECOGNITION THAT PRESENT REVIEW PROCESS WILL NOT ACCOMMODATE THE ADDITIONAL WORKLOAD THAT WILL BE REQUIRED BY THE MIDLAND UNITS

- NEED FOR TECHNICAL PROBLEM-SOLVING SUPPORT

- NEED TO IMPROVE INTERFACE BETWEEN PLANT AND GENERAL OFFICE

AREAS IDENTIFIED FOR IMPROVEMENT
IN
SAFETY MANAGEMENT

QA AUDIT PROCESS

UNNECESSARY OVERLAP OF AUDIT FINDINGS BY DIFFERENT AUDITS.

PLANT REVIEW COMMITTEE

SPENDS TOO MUCH TIME WITH PROCEDURAL MATTERS. IT HANDLES "ON-LINE" PROBLEMS BUT IS UNABLE TO ADDRESS FORWARD-LOOKING SAFETY.

SAFETY AND AUDIT REVIEW BOARD

CONSIDERS A LARGE NUMBER OF TRIVIAL ISSUES. SELDOM HAS DIRECT IMPACT ON PLANT OPERATION OR SAFETY POLICY FORMULATIONS.

SAFETY MANAGEMENT CRITERIA

- A PROGRAM WHICH AVOIDS THE FIRST ERROR RATHER THAN ONE WHICH MERELY REPORTS THAT IT HAS OCCURRED.

- A PROGRAM THAT IS PROACTIVE, WHICH THINKS AHEAD AND WHICH ASSESSES MEANINGFULLY HOW SAFELY THE PLANTS ARE OPERATED FROM BOTH A PEOPLE AND HARDWARE PERSPECTIVE.

- A PROGRAM THAT DISCLOSES DEFICIENCIES AND OPPORTUNITIES FOR SAFETY IMPROVEMENTS.

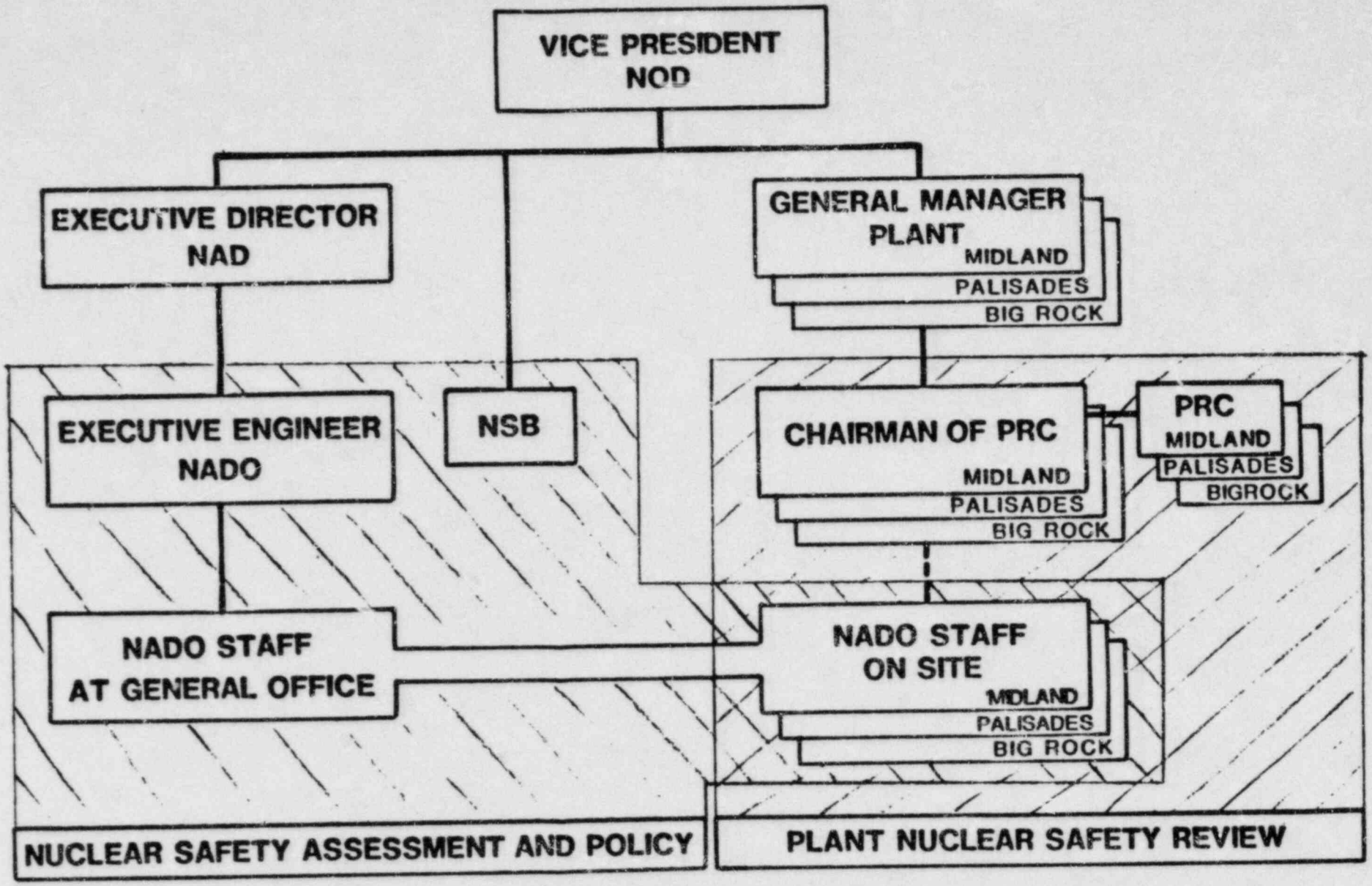
- A PROGRAM IN WHICH ACCOUNTABILITY IS IMPORTANT AND WHICH DOES NOT WASTE PEOPLE'S TIME.

SAFETY MANAGEMENT PHILOSOPHY

TO CONTINUOUSLY QUESTION:

- ARE WE DOING THE THINGS WE ARE COMMITTED TO DO?
- DO OUR COMMITMENTS, IF PERFORMED PROPERLY, RESULT IN OUR REQUIREMENTS BEING MET?
- ARE OUR REQUIREMENTS APPROPRIATE AND SUFFICIENT?

PROPOSED NUCLEAR ACTIVITIES DEPARTMENT ONSITE (NADO)
FUNCTIONAL ARRANGEMENT



CURRENT ACTIVITIES PROPOSED TO BE INCLUDED
IN THE NEW ORGANIZATIONAL ARRANGEMENT

- PLANT REVIEW COMMITTEE ACTIVITIES
- SAFETY AND AUDIT REVIEW BOARD ACTIVITIES
- PALISADES CORPORATE DAILY AUDIT REVIEW PROGRAM
- PALISADES NUCLEAR SAFETY ASSESSMENT TEAM (NSAT)
- OPERATING EXPERIENCE REVIEW PROGRAM
- TECHNICAL ASSISTANCE TO THE QA AUDIT PROGRAM FOR CERTAIN TECHNICAL SPECIFICATION REQUIRED AUDITS

NEW ACTIVITIES PROPOSED TO BE INCLUDED IN THE NEW ORGANIZATION ARRANGEMENT

- FUNCTIONS OF THE INDEPENDENT SAFETY ENGINEER

- ONSITE DIRECT TECHNICAL SUPPORT TO THE OPERATING PLANT FOR PROBLEM RESOLUTION

- INTERFACE IMPROVEMENT BETWEEN THE PLANT STAFF AND THE GENERAL OFFICE SUPPORT GROUPS

NUCLEAR ACTIVITIES DEPARTMENT ON-SITE
(NADO)
REPORTING PHILOSOPHY

NADO WILL BE AVAILABLE TO ASSIST THE FOLLOWING:

- VICE-PRESIDENT NUCLEAR OPERATIONS
- PLANT MANAGERS
- EXECUTIVE DIRECTOR NUCLEAR ACTIVITIES
- NUCLEAR SAFETY BOARD (NSB)
- PLANT REVIEW COMMITTEES (PRC)

TO PROMOTE A CLOSE WORKING RELATIONSHIP WITH EACH GROUP, REPORTS GENERATED AT THE REQUEST OF AN ORGANIZATION WILL BE DIRECTED SOLELY TO THE REQUESTING ORGANIZATION.

NSB WILL REVIEW THE ABOVE REPORTS IF:

- A SIGNIFICANT SAFETY ISSUE IS INVOLVED AND,
- EFFECTIVE CORRECTIVE ACTION IS NOT BEING TAKEN

PROPOSED REVIEW ORGANIZATION

FLEXIBILITY

ALL MEMBERS OF NADO MAY DO REVIEWS AND ASSESSMENTS AT ANY LOCATION

NUCLEAR ACTIVITIES DEPARTMENT ON-SITE

(NADO)

EXAMPLES OF REVIEWS THAT MAY BE CONDUCTED BY NADO, BUT WHICH REQUIRE DETERMINATION OR RECOMMENDATION BY PRC OR NSB ARE:

- PROCEDURES REQUIRED BY 16.6.8.2 AND CHANGES THERETO: (RG1.33 APPENDIX A, ETC) (BY PRC)
- PROPOSED CHANGES OR MODIFICATIONS (BY PRC AND NSB)
- VIOLATIONS OF TECHNICAL SPECIFICATIONS (BY PRC AND NSB)

EXAMPLES OF REVIEW THAT MAY BE CONDUCTED BY NADO AND WOULD REQUIRE NO FURTHER ACTION BY PRC OR NSB ARE:

- EVENTS REQUIRING 24-HOUR WRITTEN NOTIFICATION (FOR PRC)
- SPECIAL REVIEWS AND INVESTIGATIONS (FOR BOTH PRC AND NSB)
- PLANT EMERGENCY PLANS AND IMPLEMENTING PROCEDURES (FOR BOTH PRC AND NSB)
- OPERATING EXPERIENCE INFORMATION (FOR BOTH PRC AND NSB)
- PROPOSED TECHNICAL SPECIFICATIONS CHANGES (FOR NSB)
- SAFETY EVALUATIONS FOR CHANGES TO PROCEDURES AND EQUIPMENT (FOR NSB)

PROPOSED REVIEW ORGANIZATION
NUCLEAR ACTIVITIES DEPARTMENT ON-SITE (NADO)

AT THE DISCRETION OF PRC AND/OR SARB:*

- MAY PERFORM REVIEW RESPONSIBILITIES FOR BOTH PRC AND SARB
- MAY PERFORM OTHER RESPONSIBILITIES AS SPECIFIED IN THE TECHNICAL SPECIFICATIONS

AT THE DISCRETION OF PRC:

- MAY ASSIST OR CONDUCT THE OPERATING EXPERIENCE REVIEW PROGRAM

AT THE DISCRETION OF SARB:

- MAY REVIEW PRC MEETING AND VERIFY UNREVIEWED SAFETY QUESTION DETERMINATIONS

OTHER NADO ACTIVITIES:

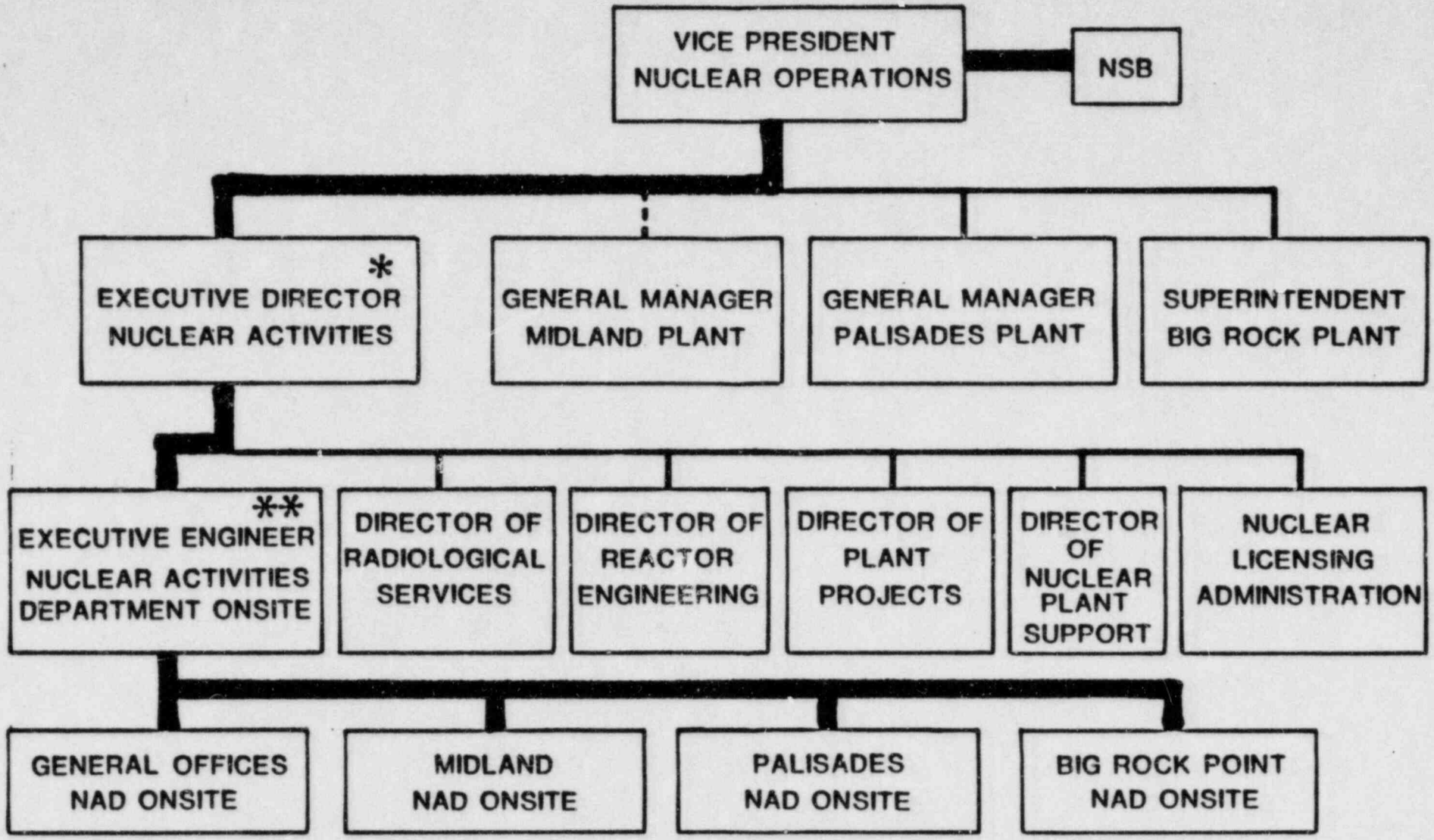
- TECHNICAL REVIEW OF OPERATIONS
- CONDUCT PALISADES CORPORATE DAILY AUDIT
- CONDUCT OR PARTICIPATE IN PALISADES NUCLEAR SAFETY ASSESSMENT TEAM

PLANT TECHNICAL ASSISTANCE

- PROVIDE ON-SITE TECHNICAL SUPPORT FOR PROBLEM RESOLUTION
- PROVIDE PLANT - GENERAL OFFICE (GO) INTERFACE

*THE PROPOSED ORGANIZATION RENAMES SARB TO NUCLEAR SAFETY BOARD (NSB)

PROPOSED ORGANIZATION



* NSB CHAIRMAN

** NSB VICE CHAIRMAN AND SECRETARY

NUCLEAR ACTIVITIES DEPARTMENT ON-SITE

(NADO)

ORGANIZATION INDEPENDENCE

- NADO REPORTS THROUGH THE EXECUTIVE DIRECTOR OF NUCLEAR ACTIVITIES TO THE VICE PRESIDENT OF NUCLEAR OPERATIONS.

  - IT REPORTS INDEPENDENT OF PLANT ACTIVITIES.

  - FOR GENERAL OFFICE NUCLEAR ACTIVITIES, IT REPORTS SEPARATELY FROM THE DEPARTMENT PERFORMING THE ACTIVITY.

PROBLEMS IDENTIFIED BY NADO WILL BE BROUGHT TO CORPORATE MANAGEMENT ATTENTION.

STAFF QUALIFICATION

THE PALISADES AND MIDLAND PLANTS WILL HAVE AN ADMINISTRATOR AND A STAFF APPROXIMATELY EQUALLY DIVIDED INTO THREE EXPERIENCE/ QUALIFICATION LEVELS.

ADMINISTRATOR

A BACHELOR DEGREE IN ENGINEERING OR RELATED SCIENCE OR EQUIVALENT AND A MINIMUM OF TEN YEARS' EXPERIENCE, SIX OF WHICH ARE IN POWER PLANT OPERATION AND/OR DESIGN.

GROUP A

A BACHELOR DEGREE IN ENGINEERING OR A RELATED SCIENCE OR EQUIVALENT AND A MINIMUM OF FIVE YEARS' PROFESSIONAL EXPERIENCE WITH A MINIMUM OF TWO YEARS' EXPERIENCE IN POWER PLANT OPERATION AND/OR DESIGN.

GROUP B

A BACHELOR DEGREE IN ENGINEERING OR RELATED SCIENCE OR EQUIVALENT AND A MINIMUM OF TWO AND ONE-HALF YEARS' EXPERIENCE.

GROUP C

PROFESSIONAL OR TECHNICAL PEOPLE WITH MINIMAL EXPERIENCE.

EQUIVALENT IS AS DEFINED IN ANSI/ANS 3.1 SECTION 4 (DECEMBER 1979 DRAFT).

STAFF QUALIFICATION

BIG ROCK POINT CURRENTLY HAS A PROBABILITY RISK ASSESSMENT (PRA) GROUP (THREE PEOPLE) WHO ARE INVOLVED IN ACCESSING PLANT SAFETY AND REPORT TO A GENERAL OFFICE ORGANIZATION. TO DISCHARGE NADO RESPONSIBILITY, ONE NADO PERSON WILL BE LOCATED AT THAT FACILITY. THIS INDIVIDUAL WILL HAVE GROUP A QUALIFICATIONS.

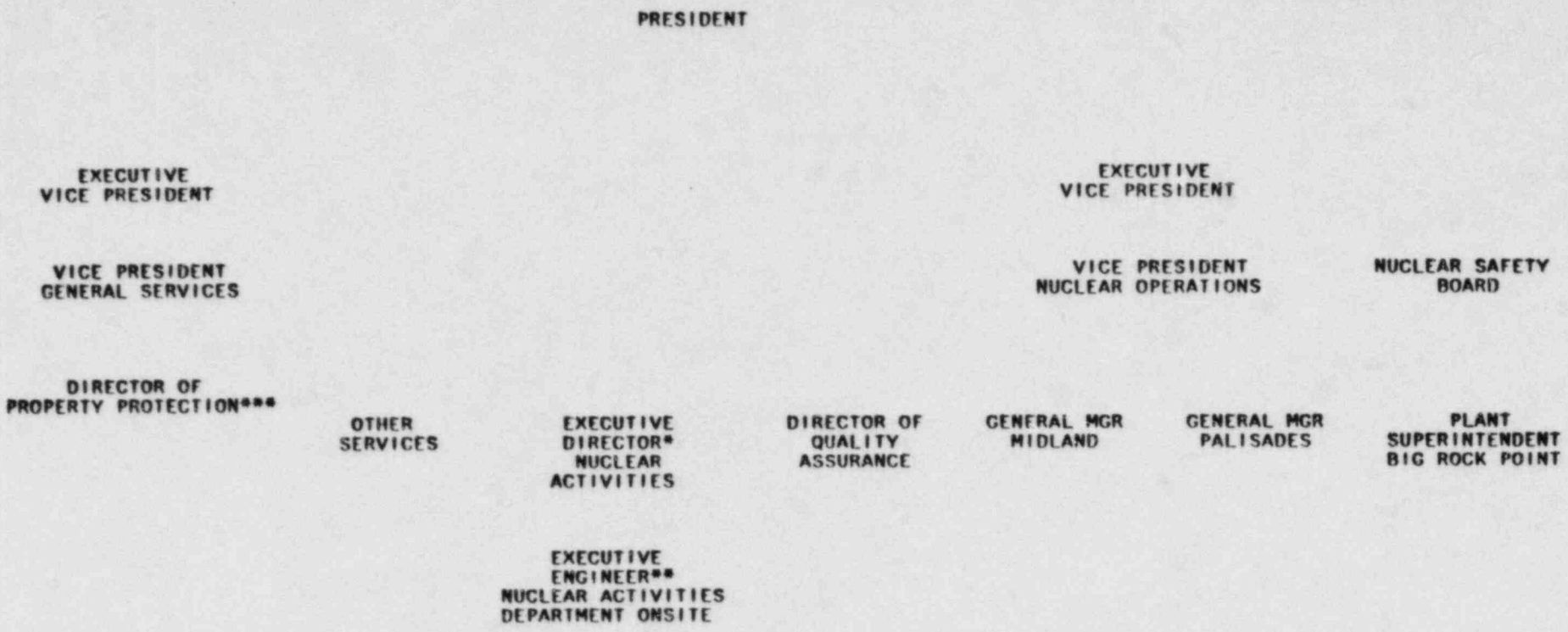
THE NADO ORGANIZATION LOCATED AT THE GENERAL OFFICE WILL CONSIST OF THE DEPARTMENT HEAD AND TWO ADDITIONAL PROFESSIONAL/TECHNICAL INDIVIDUALS.

NUCLEAR ACTIVITIES DEPARTMENT ON-SITE

(NADO)

ESTIMATED STAFFING LEVEL	1982	1983
PALISADES		
PROFESSIONAL	5	8
TECHNICAL/SECRETARIAL	1	2
MIDLAND		
PROFESSIONAL	4	10
TECHNICAL/SECRETARIAL	1	2
BIG ROCK POINT		
PROFESSIONAL	1	1
GENERAL OFFICE		
PROFESSIONAL	2	3
TECHNICAL/SECRETARIAL	1	1

CONSUMERS POWER COMPANY
OFFSITE ORGANIZATION



*NSB Chairman
**NSB Vice Chairman and Secretary
***Responsible for Overall Fire Protection Program

Figure 16.6.2-1

ENCLOSURE 2

16.6.2.3 NUCLEAR ACTIVITIES DEPARTMENT ONSITE (NADO)

FUNCTION

16.6.2.3.1 The NADO shall function as staff to the onsite and offsite review organizations and provide technical support for problem resolution and General Office interface. The individuals shall report to the Executive Engineer, NADO.

COMPOSITION

16.6.2.3.2 The NADO shall be composed of members located off the plant site, acting in this capacity for all three plants, and full-time members at the plant.

QUALIFICATIONS

16.6.2.3.3 At least one of the onsite members shall be at or above the staff engineering level.

On a temporary basis, any NADO member may be drawn upon to perform NADO duties at another nuclear plant location.

16.6.2.4 SHIFT ENGINEER

The Shift Engineer shall serve in an advisory capacity to the Plant Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

16.6.3 PLANT STAFF QUALIFICATIONS

16.6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.

16.6.3.2 The Health Physicist shall meet or exceed the qualifications of Regulatory Guide 1.8, May 1977.[1].

16.6.3.3 The Shift Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

16.6.4 TRAINING

16.6.4.1 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

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[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.

ANSI N18.1-1971 and Appendix "A" of 10 CFR, Part 55, and shall include familiarization with relevant industry operational experience.

16.6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Director of Property Protection and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except for Fire Brigade training sessions which shall be held at least quarterly.

16.6.5 REVIEW AND AUDIT

16.6.5.1 PLANT NUCLEAR SAFETY REVIEW (PNSR)

FUNCTION

16.6.5.1.1 The Plant Nuclear Safety Review (PNSR) organization shall function to advise the General Manager on all matters related to nuclear safety and to provide an examination of plant operating characteristics.

COMPOSITION

16.6.5.1.2 The PNSR organization shall consist both of individuals from the plant staff acting as a Plant Review Committee (PRC), and the Nuclear Activities Department Onsite (NADO) staff acting in an ex officio capacity to the PRC (see 16.6.2.3). The PRC shall be chaired by the Technical Engineer or by an alternat appointed by the Plant General Manager.

16.6.5.1.2.1 PLANT REVIEW COMMITTEE (PRC)

COMPOSITION

16.6.5.1.2.1.1 The PRC shall be composed of:

Chairman:	Technical Engineer
Member:	Plant Superintendent
Member:	Operations Superintendent
Member:	Technical Superintendent
Member:	Maintenance Superintendent
Member:	Chemistry/Health Physics Superintendent
Member:	Reactor Engineer
Member:	Senior Engineer
Member:	Plant/Shift Supervisor or Shift Engineer

ALTERNATES

16.6.5.1.2.1.2 Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as a voting member in PRC activities at any one time.

MEETING FREQUENCY

16.6.5.1.2.1.3 The PRC shall meet at least once per calendar month, with special meetings as required.

NUCLEAR ACTIVITIES DEPARTMENT ON-SITE
(NADO)

INDEPENDENCE OF REVIEWS

- NADO MAY DO REVIEWS FOR THE PLANT REVIEW COMMITTEE (PRC)

- NADO MAY DO REVIEWS FOR THE NUCLEAR SAFETY BOARD (NSB)

- NADO MAY PROVIDE PROBLEM SOLVING SUPPORT

- THE IMPORTANT UNREVIEWED SAFETY QUESTION DETERMINATIONS AND RECOMMENDATION RESPONSIBILITIES REMAIN WITH PRC AND NSB

THIS RELATIONSHIP ASSURES THAT SAFETY-RELATED ACTIVITIES ARE OVERVIEWED BY INDIVIDUALS NOT INVOLVED IN THE ACTIVITY.

QUORUM

16.6.5.1.2.1.4 A quorum for PRC shall consist of the Chairman or his designated alternate and four (4) members o :heir alternates, exclusive of NADO staff members.

RESPONSIBILITIES

16.6.5.1.3 The PNSR organization shall be responsible for:

a. Review of: (1) all procedures required by Technial Specification 16.6.8.2 and changes thereto and (2) any other proposed procedures or changes thereto as determined by the PRC Chairman to affect nuclear safety.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to the Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Investigation of all violations of the Technical Specifications. A report shall be prepared covering evaluation and recommendations to prevent recurrence and forwarded to the Vice President - Nuclear Operations and to the Executive Engineer, NADO.

f. Review of events requiring 24-hour written notification to the Commission.

g. Performance of special reviews and investigations and reports thereon as requested by the Plant General Manager or Chairman of NSB.

h. Review of the plant Emergency Plan and implementing procedures.

i. Examining plant operating characteristics, NRC issues, industry advisories, Licensee Event Reports and other sources which may indicate a need for improving plant safety.

j. Provide trending data of plant operating characteristics for use by the NSAP organization.

AUTHORITY

16.6.5.1.4 Authority within the PNSR organization is to be delegated between PRC and NADO as follows:

a. The PRC organization shall:

(i) Recommend in writing to the Plant General Manager approval or disapproval of items considered under 16.6.5.1.3.a. through d. above.

(ii) Render determinations in writing with regard to whether or not each item considered under 16.6.5.1.3.b. and d. above constitutes an unreviewed safety question.

(iii) Render determinations in writing with respect to the impact on safety of each item considered under 16.6.5.1.3.a. through e.

(In making determinations and recommendations, the PRC may utilize reviews conducted by NADO.)

b. The PRC organization or the NADO organization, upon request of the PRC Chairman, shall:

(i) Provide written notification within 24 hours to the Vice President - Nuclear Operations and to the Nuclear Safety Assessment and Policy organization of disagreement between the PNSR and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to 16.6.1.1 above.

(ii) Fulfill the responsibilities other than those specified in 16.6.5.1.4.a. above. For those responsibilities completed by NADO, however, concurrence of the PRC Chairman is required.

RECORDS

16.6.5.1.5 The PNSR organization shall maintain written minutes of each PRC meeting and records of transactions specified in 16.6.5.1.4.b.

16.6.5.2 NUCLEAR SAFETY ASSESSMENT AND POLICY (NSAP)

RESPONSIBILITIES

16.6.5.2.1 The Nuclear Safety Assessment and Policy (NSAP) organization is responsible for maintaining a continuing examination of nuclear plant and nuclear safety-related activities and defining opportunities for policy changes related to improved nuclear safety performance.

FUNCTION

16.6.5.2.2 The NSAP organization shall function to provide review of designated activities in the areas specified in 16.6.5.2.4.

COMPOSITION

16.6.5.2.3 The NSAP organization shall consist of both a Nuclear Safety Board (NSB) and the Nuclear Activities Department Onsite (NADO) staff. Members of NSB shall be appointed by the Vice President - Nuclear Operations. NSB shall be chaired by the Executive Director, Nuclear Activities (the Vice Chairman or a duly appointed alternate). The Executive Engineer, NADO, shall be the Vice Chairman and Secretary.

16.6.5.2.3.1 NUCLEAR SAFETY BOARD (NSB)

16.6.5.2.3.1.1 Collectively, the personnel appointed for NSB shall be competent to conduct reviews 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 NSB may possess expertise in more than one of the above specialties. He or she should, in general, have had professional experience at or above the Senior Engineer level in his specialty.

ALTERNATE MEMBERS

16.6.5.2.3.1.2 Alternate members may be appointed in writing by the Vice President - Nuclear Operations to act in place of members during any legitimate and unavoidable absences. The qualifications of alternate members shall be similar to those of members.

CONSULTANTS

16.6.5.2.3.1.3 Consultants shall be utilized as determined by the NSB Chairman or Vice Chairman to provide expert advice to the NSB. NSB members are not restricted as to sources of technical input and may call for separate investigation from any competent source.

MEETING FREQUENCY

16.6.5.2.3.1.4 NSB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once every six months thereafter.

QUORUM

16.6.5.2.3.1.5 A quorum of NSB shall consist of the Chairman or his designated alternate and four (4) members or their alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility. It is the responsibility of the Chairman to ensure that the quorum convened for a meeting contains appropriately qualified members or has at its disposal consultants sufficient to carry out the review functions required by the meeting agenda.

16.6.5.2.4 RESPONSIBILITIES

REVIEW

16.6.5.2.4.1 NSAP shall review:

a. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.

b. All events which are required by regulations or Technical Specifications to be reported to NRC in writing within 24 hours and other violations (of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements or of internal procedures or instructions) having nuclear safety significance.

c. Operational assessments and trending data.

d. Issues of safety significance identified by the Plant General Manager, the NSB Chairman, Executive Engineer NADO or the PNSR.

e. Proposed changes in Technical Specifications or licenses.

f. The results of actions taken to correct deficiencies identified by the audit program specified in Section 16.6.5.2.4.2 at least once every six months.

g. Safety evaluations for changes to procedures, equipment or systems, tests or experiments, completed under the provisions of

10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question.

AUDITS

16.6.5.2.4.2 Audits of operational nuclear safety-related facility activities shall be performed under the cognizance of NSAP. These audits shall encompass:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.

b. The performance, training and qualifications of the entire facility staff at least once per 12 months.

c. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B," 10 CFR 50, at least once per 24 months.

d. The facility Site Emergency Plan and implementing procedures at least once per 24 months.

e. The facility Security Plan and implementing procedures (as required by the Security Plan) at least once per 24 months.

f. Any other area of facility operation considered appropriate by NSAP or the Vice President - Nuclear Operations.

g. The facility Fire Protection Program and implementing procedures at least once per 24 months.

h. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.

i. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualifed fire consultant at intervals no greater than 3 years.

Audit reports encompassed by 16.6.5.2.4.2 above shall be forwarded to the NSB Vice Chairman and Secretary and Management positions responsible for the areas audited within thirty (30) days after completion of the audit.

AUTHORITY

16.6.5.2.5 Authority within the NSAP organization is to be delegated between NSB and NADO as follows:

a. For responsibilities specified in 16.6.5.2.4.1.a. through c., the NSB shall be convened. In making determinations and recommendations, the NSB may utilize reviews conducted by NADO.

b. NSAP responsibilities, other than those specified in 16.6.5.2.4.1.a. through c., may be discharged as described in a. above or by NADO review and approval of the NSB Chairman or the Executive Engineer, NADO.

c. The NSB Chairman shall report to and advise the Vice President - Nuclear Operations of significant findings associated with NSAP activities and of recommendations related to improving plant nuclear safety performance.

RECORDS

16.6.5.2.6 Records of NSAP activities shall be prepared and distributed as indicated below:

a. Minutes of each NSB meeting shall be prepared and forwarded to the Vice President - Nuclear Operations and each NSB member. Minutes shall be approved at or before the next regularly scheduled meeting following the distribution of the minutes.

b. If not included in NSB meeting minutes, reports of reviews encompassed by Section 16.6.5.2.4.1, above, shall be prepared and forwarded to the Vice President - Nuclear Operations.

c. Regular reports of NADO activities shall be presented to the NSB.

16.6.6 (Deleted)

16.6.7 SAFETY LIMIT VIOLATION

16.6.7.1 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 the Commission authorizes resumption of operation (10 CFR 50.36(c)(1)(i)).

b. The safety limit violation shall be reported within 1 hour to the Commission in accordance with 10 CFR 50.36 to the Vice President - Nuclear Operations and to NSAP.

c. A report shall be prepared in accordance with 10 CFR 50.36 and 16.6.9 of this specification. The safety limit violation and the report shall be reviewed by the PNSR.

d. The report shall be submitted within 14 days to the Commission (in accordance with the requirements of 10 CFR 50.36) and to the Vice President - Nuclear Operations and to NSAP.

16.6.8 PROCEDURES

16.6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, February 1977.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

16.6.8.2 Each procedure and administrative policy of 16.6.8.1, above, and changes thereto, shall be reviewed by the PNSR (except for Security Implementing Procedures which are reviewed and approved in accordance with the Site Security Plan) and approved by the Plant Manager prior to implementation.

16.6.8.3 Temporary changes to procedures of 16.6.8.1, above, may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, considered by the PRC at the next regularly scheduled meeting, and approved by the Plant General Manager.

16.6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

16.6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted:

PLANT NUCLEAR SAFETY REVIEW (PNSR)

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Function	The (Unit Review Group) shall function to advise the (Plant Superintendent) on all matters related to nuclear safety.	"The Plant Nuclear Safety Review (PNSR) organization shall function to advise the General Manager on all matters related to nuclear safety and to provide an examination of plant operating characteristics."
Composition	The (Unit Review Group) URG shall be composed of the: Chairman: Plant Superintendent Member: Operations Supervisor Member: Technical Supervisor Member: Maintenance Supervisor Member: Plant I&C Engineer Member: Plant Nuclear Engineer Member: Health Physicist	"The PNSR Organization shall consist both of individuals from the plant staff acting as a Plant Review Committee (PRC), and the Nuclear Activities Department Onsite (NADO) staff acting in an ex-officio capacity to the PRC (see 16.6.2.3). The PNSR shall be chaired by the Plant General Manager or by a member of his immediate staff appointed by the Plant General Manager." The PRC shall be composed of: - Equivalent to the Standard with the exceptions of the Technical Engineer as Chairman and an additional member - the Plant/Shift Supervisor or Shift Engineer.
Alternates	All alternate members shall be appointed in writing by the (URG) Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in (URG) activities at any one time.	- Identical to the Standard.
Meeting Frequency	The (URG) shall meet at least once per calendar month and as convened by the (URG) Chairman or his designated alternate.	"The PRC shall meet at least once per calendar month, with special meetings as required."
Quorum	The minimum quorum of the (URG) necessary for the performance of the (URG) responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.	- Equivalent to the Standard.

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Responsibilities	The (URG) shall be responsible for:	The PNSR organization shall be responsible for:
	a. Review of (1) all procedures required by Specification 6.8 and changes thereto, (2) all programs required by Specification 6.8 and changes thereto, and (3) any other proposed procedures or changes thereto as determined by the (Plant Superintendent) to affect nuclear safety.	a. "Review of (1) all procedures required by Technical Specification 16.6.8.2 and changes thereto, and (2) any other proposed procedures or changes thereto as determined by the PRC Chairman to affect nuclear safety." - (Review of all programs required by Specification 16.6.8 and changes thereto, has been excluded because we have no programs listed in Specification 16.6.8.) - (In Part (3) the PRC Chairman replaces the Plant Superintendent.)
	b. Review of all proposed tests and experiments that affect nuclear safety.	b. Identical to the Standard.
	c. Review of all proposed changes to Appendix "A" Technical Specifications.	c. "Review of all proposed changes to the Technical Specifications."
	d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.	d. Identical to the Standard.
	e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the (Superintendent of Power Plants) and to the (CNRAG).	e. "Investigation of all violations of the Technical Specifications. A report shall be prepared covering evaluation and recommendations to prevent recurrence and forwarded to the Vice President-Nuclear Operations and to the Executive Engineer, NADO." - (CP Co concludes that this meets the intent of the Standard.)
	f. Review of events requiring 24-hour written notification to the Commission.	f. Identical to the Standard.

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Responsibilities (Contd)	g. Review of unit operations to detect potential nuclear safety hazards.	- The intent of this Standard is incorporated in 16.6.5.1.3.i. In addition, responsibility (i) includes NRC issues, industry advisories, Licensee Event Reports and other sources which may indicate a need for improving plant safety.
	h. Performance of special reviews, investigations or analyses and reports thereon as requested by the (Plant Superintendent) or the (CNRAG).	g. Equivalent to the Standard.
	i. Review of the Security Plan and implementing procedures and shall submit recommended changes to the (CNRAG).	- Section 16.6.8.2 states that the Security Plan procedures and policies are excluded from the PNSR responsibilities and are to be reviewed in accordance with the Site Security Plan.
	j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the (CNRAG).	h. "Review of the plant Emergency Plan and implementing procedures." - (Review may be performed by NADO and thus need not be considered by NSB.)
		j. "Provide trending data of plant operating characteristics for use by the NSAP organization."
Authority	The (URG) shall:	
	a. Recommend in writing to the (Plant Superintendent) approval or disapproval of items considered under 6.5.1.6(a) through (d) above.	a. Identical to the Standard.
	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.	b. "Render determinations in writing with regard to whether or not each item considered under 16.6.5.1.3.b and d above constitutes an unreviewed safety question. Render determination in writing with respect to the impact on safety of each item considered under 16.6.5.1.3.a through e." - (CP Co concludes that this meets the intent of the Standard.)

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Authority (Contd)	c. Provide written notification within 24 hours to the (Superintendent of Power Plants) and the (CNRAG) of disagreement between the (URG) and the (Plant Superintendent); however, the (Plant Superintendent) shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.	c. Equivalent to the Standard. - Responsibility may be completed by NADO review and concurrence of the PRC Chairman.
		- Fulfill the responsibilities other than those specified in 16.6.5.1.4.a. Responsibilities may be completed by NADO review and concurrence of the PRC Chairman.
Records	The (URG) shall maintain written minutes of each (URG) meeting that, at a minimum, document the results of all (URG) activities performed under the responsibility and authority provisions of these Technical Specifications. Copies shall be provided to the (Superintendent of Power Plants and the (CNRAG)).	"The PNSR organization shall maintain written minutes of each PRC meeting and records of transactions specified in 16.6.5.1.4.b." - The presence of the NADO organization will assure that important safety problems are brought to Management's attention. Distribution of meeting minutes need not be required. (CP Co. concludes that this meets the intent of the Standard.)

NUCLEAR SAFETY ASSESSMENT AND POLICY (NSAP)

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Responsibilities	No Standard	"The NSAP organization is responsible for maintaining a continuing examination of nuclear plant and nuclear safety-related activities and defining opportunities for policy changes related to improved nuclear safety performance."
Function	No Standard	"The NSAP organization shall function to provide review of designated activities in the areas specified in 16.6.5.2.4."
Composition	No Standard	"The NSAP organization shall consist of both a Nuclear Safety Board (NSB) and the Nuclear Activities Department Onsite (NADO) staff. Members of NSB shall be appointed by the Vice President-Nuclear Operations. NSB shall be chaired by the Executive Director, Nuclear Activities (the Vice Chairman or a duly appointed alternate). The Executive Engineer, NADO, shall be the Vice Chairman and Secretary." - (CP Co concludes that the above statements meet the intent of NUREG-0737, Item II.B.1.2.)
Company Nuclear Review and Audit Group (CNRAG) Function	The (CNRAG) shall function to provide independent review and audit of designated activities in the areas of: 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 i. (Other Appropriate Fields Associated With the Unique Characteristics of the Nuclear Power Plant)	- Equivalent to the Standard. In addition we state: "An individual appointed to NSB may possess expertise in more than one of the above specialties. He or she should, in general, have had professional experience at or above the Senior Engineer level in his specialty."

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
(CNRAG) Composition	The (CNRAG) shall be composed of the: Director: (Position Title) Member: (Position Title) Member: (Position Title) Member: (Position Title) Member: (Position Title)	- CP Co concludes that this Standard is adequately satisfied by Sections 16.6.5.2.3 and 16.6.5.2.3.1.1.
(CNRAG) Alternates	All alternate members shall be appointed in writing by the (CNRAG) Director to serve on a temporary basis; however, no more than two alternates shall participate as voting members in (CNRAG) activities at any one time.	"Alternate members may be appointed in writing by the Vice President-Nuclear Operations to act in place of members during any legitimate and unavoidable absences. The qualifications of alternate members shall be similar to those members." - (CP Co concludes that this meets the intent of the Standard.)
(CNRAG) Quorum	Consultants shall be utilized as determined by the (CNRAG) Director to provide expert advice to the (CNRAG).	- Equivalent to the Standard.
(CNRAG) Meeting Frequency	The (CNRAG) shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading at least once per six months thereafter.	- Identical to the Standard.
(CNRAG) Quorum	The minimum quorum of the (CNRAG) necessary for the performance of the (CNRAG) review and audit functions of these Technical Specifications shall consist of the Director or his designated alternate and (at least four CNRAG) members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.	- Equivalent to the Standard.

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Review	The (CNRAG) shall review:	g. "Safety evaluations for changes to procedures, equipment or systems, tests or experiments, completed under the provisions of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question."
	a. The safety evaluations for (1) changes to procedures, equipment or systems, and (2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.	- Requires NSAP review of changes made under the provisions of Section 50.59, 10 CFR.
	b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.	- Changes that involve an unreviewed safety question will require a Technical Specifications change (see d below).
	c. Proposed tests or experiments which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.	- Unreviewed safety questions require a Technical Specifications change (see d below).
	d. Proposed changes to Technical Specifications or this Operating License.	e. Identical to the Standard.
	e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.	- Incorporated in (b). CP Co concludes that this meets the intent of the Standard.
	f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.	a. Identical to the Standard.
	g. Events requiring 24-hour written notification to the Commission.	- Incorporated in (b). CP Co concludes that this meets the intent of the Standard.

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
	h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems or components that could affect nuclear safety.	- All deficiencies which might be reviewed under this requirement would already require review under other existing requirements. Therefore, this Standard has been excluded.
	i. Reports and meeting minutes of the (URG).	- PRC activities will be reviewed as part of the NADO interaction with PRC. This will surface important issues. No formal review of meeting minutes is considered necessary.
	No Standard	c. "Operational assessments and trending data." - CP Co concludes that this meets the intent of NUREG-0737, Action Item I.B.1.2.
	Section 6.5.2.8.f of the Standard	f. "The results of actions taken to correct deficiencies identified by the audit program specified in Section 16.6.5.2.4.2 at least once every six months." - (This Standard is more appropriate in the review section than audit section.)
Audits	Audits of unit activities shall be performed under the cognizance of the (CNRAG). These audits shall encompass: a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.	a. Identical to the Standard.
	b. The performance, training and qualifications of the entire unit staff at least once per 12 months.	b. Identical to the Standard.
	c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.	- This Standard is incorporated in 16.6.5.2.4.1.f. CP Co concludes that this meets the intent of the Standard.

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
	d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix "B," 10 CFR 50, at least once per 24 months.	c. Identical to the Standard.
	e. The Emergency Plan and implementing procedures at least once per 24 months.	d. Identical to the Standard.
	f. The Security Plan and implementing procedures at least once per 24 months.	e. Equivalent to the Standard.
	g. Any other area of unit operation considered appropriate by (CNRAG) or the (Vice President-Operations).	f. Identical to the Standard.
	h. The Fire Protection Program and implementing procedures at least once per 24 months.	g. Identical to the Standard.
	i. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.	h. Identical to the Standard.
	j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than three years.	i. Identical to the Standard.
		"Audit reports encompassed by 16.6.5.2.4.2 above shall be forwarded to the NSB Vice Chairman and Secretary and Management positions responsible for the areas audited written thirty (30) days after completion of the audit."

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Authority	The (CNRAG) shall report to and advise the (Vice President Operations) on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.	- This section outlines how authority within the NSAP organization is to be delegated between NSB and NADO. CP Co concludes that this section meets the intent of the Standard and NUREG-0737, Action Item I.B.1.2.
Records	Records of (CNRAG) activities shall be prepared, approved and distributed as indicated below:	
	a. Minutes of each (CNRAG) meeting shall be prepared, approved and forwarded to the (Vice President-Operations) within 14 days following each meeting.	a. "Minutes of each NSB meeting shall be prepared and forwarded to the Vice President-Nuclear Operations and each NSB member. Minutes shall be approved at or before the next regularly scheduled meeting following the distribution of the minutes." - (CP Co concludes that this meets the intent of the Standard.)
	b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the (Vice President-Operations) within 14 days following completion of the review.	b. "If not included in NSB meeting minutes, reports of reviews encompassed by Section 16.6.5.2.4.1 above shall be prepared and forwarded to the Vice President-Nuclear Operations." - (CP Co concludes that this meets the intent of the Standard.)
	c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the (Vice President-Operations) and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.	- This Standard is stated in Section 16.6.5.2.4.2, last paragraph. Cognizance of audits is an NSAP responsibility. Important safety issues will be brought to the attention of the Vice President-Nuclear Operations.
	No Standard	- Regular reports of NADO activities shall be forwarded to NSB.

SECTION TITLE	STANDARD TECHNICAL SPECIFICATIONS	PROPOSED MIDLAND PLANT TECHNICAL SPECIFICATIONS AND/OR COMMENTS
Reportable Occurrence Action	The following actions shall be taken for REPORTABLE OCCURRENCES: a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9. b. Each REPORTABLE OCCURRENCE requiring 24-hour notification to the Commission shall be reviewed by the (URG) and submitted to the (CNPAG) and the (Superintendent of Power Plants).	- CP Co has concluded that this Standard is redundant to Section 16.6.9. Therefore, this section has been excluded.

Enclosure 3

May 4, 1982 Meeting
Attendees

NRC Staff
John A Zwolinski
E. J. Weinkam
T. Wambach
W. D. Shafer
E. S. Pederson
Charles M. Overbey
Frederich Allenspach
Bob Benedict
J. J. Persensky
J. M. Peschel
Richard Emch

CPCo
Frederick Buckman
Kenneth Terry
Roger W. Huston
Ralph R. Frisch
David A. Bixel
David J. VandeWalle
Kenneth J. Straup

ML233

May 14, 1982

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations

FROM: R. F. Fraley, Executive Director, ACRS

SUBJECT: FOUNDATION PROBLEMS AND RELATED REMEDIAL ACTIONS AT THE MIDLAND PLANT SITE

Consistent with the request of the Office of Nuclear Reactor Regulation for comments, an Ad hoc ACRS Subcommittee has reviewed the foundation problems and related remedial actions at the Midland Plant Units 1 and 2. These issues were discussed during an April 29, 1982 meeting of the Ad hoc Subcommittee and during the 265th full Committee meeting (May 6-8, 1982). As a result of these meetings, the ACRS accepted the Subcommittee's recommendations that:

1. The ACRS Midland Plant Subcommittee review the adequacy of the seismic input criteria and the Site Specific Response Spectrum and its relation to the proposed permanent site dewatering as a means of reducing the probability of soil liquefaction due to an earthquake.

2. Subject to a finding by the Midland Plant Subcommittee regarding the adequacy of the seismic input criteria, the ACRS recognize the adequacy of the NRC Staff's efforts and consider the proposed remedial measures as a matter that can and should be resolved in a manner satisfactory to the NRC Staff.

3. The EDO be informed at this time that the ACRS has found the Staff's approach to be acceptable, subject to the further review mentioned in Item 1 above.

The seismic related issues at Midland are tentatively scheduled to be discussed during the May 20-21, 1982 Midland Plant Subcommittee meeting in Midland, MI. These issues and others related to the application of Consumers Power Company for a license to operate Midland Plant Units 1 and 2 are tentatively scheduled for review by the full ACRS during its 266th meeting (June 3-5, 1982).

cc:
H. Denton, NRR
E. Goodwin, NRR
bcc: ACRS members, R. Hood, NRR, D. Fischer, ACRS
S. Chilk and Commission

8205240003

FILE: Midland

OFFICE	ACRS	ACRS					
SURNAME	Fischer:car	Fraley					
DATE	5/14/82	5/14/82					

NRC FORM 318 (10-80) NRCM 0240

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