



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 146 TO FACILITY OPERATING LICENSE NO. DPR-20

CONSUMERS POWER COMPANY

PALISADES PLANT

DOCKET NO. 50-255

1.0 INTRODUCTION

By letters dated April 2, 1990 and July 15, 1991; as amended September 21, 1990, and December 20, 1991, respectively, Consumers Power Company (the licensee) requested amendment to the Technical Specifications (TS) appended to Facility Operating License No. DPR-20 for the Palisades Plant. The proposed amendment would revise the Palisades Technical Specifications to: (1) transfer responsibility for the industry operating experience review program from the plant safety and licensing group to the plant review committee, (2) make various editorial corrections, and (3) incorporate changes from the most recent Palisades Plant reorganization. The supplemental submittals provided additional information and clarifications and did not alter the initial proposed no significant hazards determination.

2.0 EVALUATION

2.1 Industry Operating Experience

Consumers Power Company (CPC) letter dated April 2, 1990 proposed a TS change to delete assignment of the functional responsibility for the Industry Operating Experience Review Program from the TS. Amendment No. 127, dated August 16, 1989 added the Plant Safety and Licensing Group to the Palisades Organization. One of the group's functions was to examine industry safety and to recommend nuclear safety improvements. The NRC staff found this change acceptable as it established a formal group to perform reviews for the Plant Review Committee (PRC) and to perform some of the functions normally done by an Independent Safety Engineering Group.

CPC letter dated April 2, 1990 noted that due to a Palisades Plant reorganization, the responsibility for the Industry Operating Experience Program had been reassigned to a newly created organizational unit under the engineering and maintenance manager. Although CPC's intent is to maintain this function within their organizational structure, they stated that deleting reference to this function from the TS would "allow" management the flexibility to assign this responsibility as the needs of the organizational structure change. As such, CPC requested that TS 6.5.3.1, Plant Safety and Licensing Function be revised to delete reference to the industry operating experience review.

The NRC staff was concerned that deletion of this responsibility from the TS could result in a reduction in CPC's commitment to perform adequate reviews of industry operations experience. Discussion with the licensee indicated that

the Plant Review Committee (PRC) currently performs a nuclear safety review of industry operating experience, and would continue to perform this function regardless of the organizational unit this review is assigned to. CPC supplemented this proposed change by letter dated September 27, 1990, which added nuclear industry operating experience to the list of PRC responsibilities in TS 6.5.1.6 and 6.5.1.7.

We find these changes acceptable as they allow flexibility in the assignment of the industry operating experience review function, yet formalizes responsibility for the nuclear safety review of this program to the PRC.

2.2. Editorial Corrections

CPC has proposed the following editorial changes to the TS:

1. Change the first "SV-2412B" for penetration 40B in Table 4.6.1 to "SV-2412A".
2. For penetration number 49, change service line size from (3") to (6").
3. Change "4.20" to "4.21" at the end of Section 3.25.1.
4. Change "NSB" to "NPAD" at the end of Section 6.10.2., by deleting "NSB" and adding "reviews performed by NPAD."

Changes 1 and 2 correct typographical errors made during the issuance of Amendment 128 dated September 5, 1989. Change 3 corrects a typographical error made during the issuance of Amendment 122 dated May 19, 1989. Change 4 corrects an oversight made during the issuance of Amendment 127 dated August 16, 1989. We have reviewed these TS amendments and find the proposed editorial changes consistent with previously approved TS sections. Therefore, these changes are considered acceptable.

2.3 Plant Reorganization

Effective April 1, 1991, Consumers Power Company restructured the Nuclear Operations Department (NOD) with emphasis on changes in the engineering off-site review and quality assurance organizations. A new design engineering group, the Nuclear Engineering and Construction Organization (NECO), formed from a combination of resources from existing NOD and Energy Supply Services departments, was implemented and located at Palisades. This group is headed by the Nuclear Engineering and Construction Manager, who reports directly to the Vice President of Nuclear Operations. Another new group, called the Nuclear Performance Assessment Department (NPAD), is responsible for both the traditional QA audit function and the independent review function. This group is headed by the Director, NPAD, who reports directly to the Vice President of Nuclear Operations.

To align the requirements of the Palisades Technical Specifications with the above described organizational changes, a technical specification change was requested by letter dated July 15, 1991. Additionally, to facilitate changes in the Plant Review Committee (PRC) composition, this request proposed to change the composition of the PRC in that the specific titles of members are being deleted and replaced with a generic description. With the management reorganization, some of the position titles listed in the existing technical specifications for PRC members have been eliminated while other comparable position titles have been added. Changes were also proposed to the member qualification requirements and review functions of, the "Off-site Safety Review Group," called NPAD under the new organization.

NRC review of the proposed TS changes resulted in a letter to the licensee dated October 28, 1991, requesting clarification of the following items:

- Minimum PRC and NPAD member qualification requirements,
- PRC quorum requirements,
- Deletion of the second-level NPAD review, and
- NPAD functional area review responsibilities.

The licensee responded with a revised TS amendment request dated December 20, 1991. The revision referenced conservative ANSI standard qualification requirements for PRC and NPAD members. Regarding the PRC quorum, the revision maintained PRC composition at eight members, thereby removing the need to address an increase in the quorum requirement. Regarding second-level NPAD review, the licensee proposed that NPAD will meet at least two times a year. Furthermore, at these meetings, the committee will sample reviews approved by only one independent reviewer. Finally, the licensee has proposed to maintain NPAD review in all areas currently stated in the TS.

The revised TS amendment request is considered acceptable to the staff. PRC make-up, member qualification requirements, and quorum are maintained and are acceptable. Reportable event determinations are properly referenced to TS Section 6.9.2. Changes to organizational unit descriptions (i.e., NPAD) are clearly editorial in nature. And finally, the "Off-site Safety Review Group," NPAD, maintains its independence as a reviewing body with direct access to the Vice-President, Nuclear Operations. This group maintains member qualification requirements in accordance with Section 4.7 of ANSI/ANS 3.1-1987, and will meet as conditions requiring interdisciplinary review arise, but no less than twice yearly. These organizational changes are considered acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Michigan State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to administrative procedures. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (56 FR 27041 and 56 FR 41578). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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