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Power
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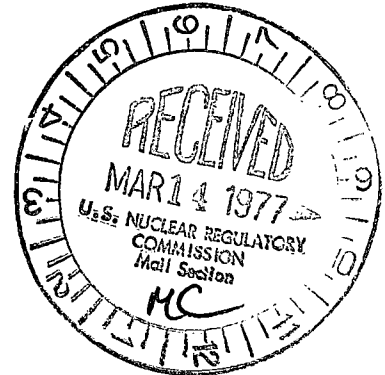
General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

March 9, 1977

Regulatory Docket File

Director of Nuclear Reactor Regulation
Att: Albert Schwencer, Chief
Operating Reactor Branch No 1
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255, LICENSE DPR-20 -
PALISADES PLANT - REVIEW OF
PROPOSED TECHNICAL SPECIFICATIONS
CHANGES



By letter dated January 19, 1977, the office of inspection and enforcement - Region III raised certain questions related to our practice of reviewing proposed Technical Specifications changes. We responded to their questions by letter dated February 9, 1977 (attached) and indicated that we would review the matter further with the Director of Nuclear Reactor Regulation.

As described in our February 9, 1977 letter, we believe that our present practice is appropriate and that a significant change in this practice could have significant undesirable effects.

If you should find it desirable, we would be happy to participate in a meeting on this subject and could present a detailed review of our concern.

David A Bixel
Nuclear Licensing Administrator

CC: JGKeppler, USNRC

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February 9, 1977

Mr James G Keppler
Office of Inspection & Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255, LICENSE DPR-20 -
PALISADES PLANT - CITATION RESPONSE

This letter is written to explain action taken with respect to an apparent deficiency reported in your IE Inspection Report 050-255/76-24. This report was transmitted by letter dated January 19, 1977. The stated deficiency and a discussion of this deficiency follow below:

"Deficiency

Contrary to Technical Specification 6.5.1.6.c, the Plant Review Committee did not review the proposed Technical Specifications change dealing with steam generator tube plugging criteria prior to it being transmitted to the Office of Nuclear Reactor Regulation (ONRR) on March 9, 1976."

Discussion

In order to develop a perspective of the review of proposed Technical Specifications, we would like to note the following:

1. As observed in the "Report Details," your inspector noted that the specification for Plant Review Committee (PRC) review reads "... review of all proposed changes to the Technical Specifications." Specifically the requirement does not indicate when this review is to be done and, therefore, the intent of this specification is subject to interpretation.
2. Technical Specification 6.5.2.7(b) states the review requirements for our Safety and Audit Review Board (SARB). These requirements are similar and read "... proposed changes to the technical specifications...." We note this item because we conclude that SARB review requirements may also need to be clarified.

3. From reviewing your "Report Details," it was not clear whether or not your inspector observed that in the conclusion section of the referenced proposed Technical Specifications (submitted by letter dated March 6, 1976) we stated the following: "This change has not been reviewed by our Palisades Plant Review Committee or the Safety and Audit Review Board. These reviews will be conducted in the near future and we will advise you should any of the proposed changes be deemed inappropriate."
4. The subject Technical Specifications involved the previous submittal of two technical reports, a meeting held with the Office of Nuclear Reactor Regulation (ONRR) in Bethesda (on February 26, 1976) and the transmittal letter noted by your inspector (March 9, 1976). That letter contained over 100 pages of information and figures.

Where practical, we prefer and practice obtaining PRC approval of proposed Technical Specifications prior to submittal to the ONRR. There are, however, times when this is not practical and the example observed is typical of this type of event. Significant data were transmitted and meetings held with the ONRR in February and March of 1976. However, it was understood at that time that a final technical specification change could not be submitted until after the results of the inspection program were obtained and analyzed. In order to afford the ONRR staff as much time as possible to complete their review and not infringe on the anticipated plant start-up date (ie, cause the outage to be delayed due to licensing matters), we on occasion do submit proposed Technical Specifications prior to completing their review by the PRC. As in the March 9, 1976 submittal, the status of PRC approval is noted in the conclusion section of the report.

Your inspector indicated concern that this procedure might influence the PRC. We have concluded that processing of the proposed Technical Specifications changes in the present manner will not adversely affect PRC review and, in fact, has a positive effect in that it allows them additional time to perform the review. Should the results of a PRC review determine that a proposed change is inappropriate, we would immediately advise the ONRR.

Handling of reviews by our SARB is done in a significantly different manner. We have generally considered SARB responsibility more as an overview. Although there are times when the SARB is asked to review proposed Technical Specifications prior to submittal, most of the reviews are conducted after the submittal has been made. We conclude that this manner of performing the review is consistent with the purpose of the SARB.

We note in the "Report Details" that IE:III management has concluded that the interpretation of Technical Specification 6.5.1.6.c was meant to have PRC consider proposed Technical Specifications changes prior to their being forwarded to ONRR.

While we generally do perform our PRC review in conformance with this interpretation, we conclude that there will be times when this is not practical or

desirable. Such a rigid interpretation, we have concluded, will cause unnecessary extension of plant outages and/or unnecessarily reduce the time available for review by both our PRC and members of the ONRR staff.

We will review this matter with the Director of Nuclear Reactor Regulation and make changes in our operating practice if that is determined to be required.

David A Bixel (Signed)

David A Bixel
Nuclear Licensing Administrator

CC: Director of Nuclear Reactor Regulation