



Consumers
Power
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

February 21, 1984

James G Keppler, Administrator
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - RESPONSE TO NRC OPEN ITEM CONCERNING PLANT REVIEW COMMITTEE
REVIEWS BY BALLOT

NRC Inspection Report 83-24, dated October 20, 1983, included the following
Open Item (78-30-08).

This item identified that the Plant Review Committee (PRC) and the Safety and Audit Review Board (SARB) were using a ballot type review. The Inspection report and a letter dated July 12, 1979, from the NRC Office of Nuclear Reactor Regulation (NRR) to Consumers Power Company stated that the ballot type review does not conform with the position that each committee must formally convene a quorum to act on issues for which it is responsible. In response, the licensee submitted a letter to NRR dated September 12, 1979, stating they were in the process of surveying other utilities on how best to deal with the tremendous amount of material being reviewed by ballot. The licensee committed to respond more fully on this subject a month later.

The inspector discussed this item with the Technical Engineer and found that the additional response committed to in the September 12, 1979 letter was never completed. Additionally, the Plant Administrative Procedures still allow use of the ballot type review. The Technical Engineer estimated that approximately 95% of the documents reviewed by ballot were withheld from implementation until subsequently reviewed by a formally convened quorum. The Technical Engineer committed to complete the followup to the September 12, 1979 correspondence on this matter.

8405040217 840501
PDR ADOCK 05000255
Q PDR

OC0284-0010AA-NL02

FEB 24 1984

JGKeppler, Administrator
Palisades Plant
RESPONSE TO NRC OPEN ITEM
CONCERNING PRC REVIEWS BY BALLOT
February 21, 1984

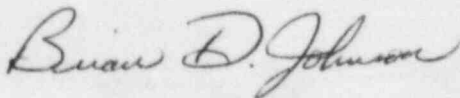
2

The response provided herein addresses the use of a ballot type review by the PRC only.

Palisades Plant Technical Specifications section 6.5.1.5 defines the PRC quorum as "...the Chairman and four members (including alternates)." Nuclear Operations Department Standards (NODS) - A17, "Management Overview", section 5.3.4.b, states in part that "Reviews by document routing shall be considered complete when no safety-related comments by designated members remain unresolved and the PRC Chairman has approved the review". NODS-A17, section 5.3.6, qualifies PRC review by ballot by stating, in part, that "After the routing is complete, the document and review comments shall be delivered to the PRC Chairman for review. If there are no unresolved safety issues and, if the Chairman is satisfied that the reviewers collectively have the necessary expertise, he may approve the document. This approval shall be documented in the minutes of the next regular PRC meeting. If unresolved comments exist, or if the Chairman chooses not to approve the document, it shall either be re-routed for comment resolution or put on the agenda for deliberation at the next regular PRC meeting or at a special meeting". This method of controlling PRC review by ballot is implemented at the Palisades Plant by Administrative Procedure 3.01, "Review and Audit", section 5.6.

The controls described above ensure that all documents which are reviewed by the PRC via balloting must be approved by the PRC Chairman prior to their implementation. If, for any reason, the Chairman determines that further review of a routed document is warranted, the Chairman has the authority to withhold his approval, and consequently implementation of the document, until such time as the Chairman considers that the review is adequate and complete.

Therefore, in response to this Open Item, Consumers Power Company has established strict controls over ballot type PRC reviews rather than surveying other utilities as stated in our letter of September 12, 1979. Consumers Power Company believes that these controls ensure that the PRC review of safety-related matters is thorough and comprehensive.



Brian D Johnson
Staff Licensing Engineer

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades