



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 76 TO FACILITY OPERATING LICENSE NO. DPR-6

CONSUMERS POWER COMPANY

BIG ROCK POINT PLANT

DOCKET NO. 50-155

1.0 INTRODUCTION

By memorandum letter dated January 30, 1985, as revised on February 1, 1985, and June 7, 1985, Consumers Power Company (the licensee) submitted a proposed amendment to the Big Rock Point Plant (BRP) Technical Specifications (TS) as appended to Facility Operating License No. DPR-6. The proposed changes pertain to offsite corporate reorganizations of the Quality Assurance Organization and the Nuclear Activities Plant Organization (NAPO), and specifically, impact the Administrative Controls TS. The changes relate to three specific areas:

- (1) Changes to titles of individuals and groups,
- (2) Miscellaneous administrative changes to clarify wording, and
- (3) Reorganization of the Quality Assurance Program functions.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on May 21, 1985 (50 FR 20974). No requests for hearing and no public comments were received.

2.0 EVALUATION

This evaluation provides the justification for offsite organizational and titular changes. These changes must be consistent with 10 CFR Part 50, Appendix B requirements. The proposed amendment revises TS 6.2.3.1, 6.2.3.2, 6.2.3.3, 6.5.1.6.e., 6.5.2.3.b., 6.5.2.8.1, and Figures 6.2-1 and 6.2-2. These proposed revisions are being evaluated for purposes of determining their impact on the operation and administration of plant activities.

2.1 Proposed Change to TS 6.2.3.1

Description of Change

The proposed change changes the title of the Nuclear Activities Plant Organization (NAPO) to the Independent Safety Engineering Group and changes the reporting point for this organization from the Executive Engineer - NAPO to the Director - Nuclear Safety.

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Evaluation

The proposed titular change from NAPO to ISEG is purely administrative in nature, does not represent a change in functional responsibility, has no effect on safety, and is acceptable.

The proposed change to the ISEG reporting point establishes that point at the Director level, a higher management level than Executive Engineer. As such, the ISEG will occupy a position of greater management authority. Given that the defined functions of the ISEG are the same as the NAPO, namely, examination of plant operating characteristics, NRC issuances, industry advisories, licensee event reports, and other sources which may indicate areas for improving plant safety, this change will focus higher level management attention on these matters and, as such, is acceptable.

2.2 Proposed Change to TS 6.2.3.2

The proposed change changes the title of NAPO to ISEG and specifies that the ISEG shall be composed of members located at other licensee nuclear power facilities.

Evaluation

The proposed titular change from NAPO to ISEG is purely administrative, does not represent a change in functional responsibility, has no effect on safety, and is acceptable.

The existing TS 6.2.3.2 specifies that NAPO be composed of members located at other licensee nuclear power facilities and the licensee's general office. The proposed change requires that the ISEG be composed of members located at other licensee nuclear power facilities only and is reflective of personnel transfers from the General Office to the Nuclear Power facilities. Personnel qualification requirements remain unchanged. As such, this change is purely administrative, has no effect on safety, and is acceptable.

2.3 Proposed Change to TS 6.2.3.3

Description of Change

The proposed change changes the title of the NAPO to the ISEG.

Evaluation

The proposed titular change from NAPO to ISEG is purely administrative, does not represent a change in functional responsibility, does not affect safety, and is acceptable.

2.4 Proposed Change to TS 6.5.1.6.e

Description of Change

The proposed change requires that reports of Plant Review Committee (PRC) investigations of TS violations be submitted to the Director-Nuclear Safety instead of the Executive Engineer, NAPO.

Evaluation

This change reflects the replacement of the Executive Engineer, NAPO with the Director-Nuclear Safety as discussed in response to the proposed change to TS 6.2.3.1 above. This change establishes consistency within the TS and results in PRC reports of TS violations being sent to a higher level of management than previously required. This is viewed as an enhancement of safety and is acceptable.

2.5 Proposed Change to TS 6.5.2.3

Description of Change

The proposed change establishes the Executive Director of Nuclear Assurance as the chairperson of the Nuclear Safety Board (NSB) and the Director-Nuclear Safety as the Vice Chairman and Secretary of the NSB.

Evaluation

Existing TS specify that the Executive Director of Nuclear Activities function as the chairperson of the NSB and the Executive Engineer - NAPO function as the Vice Chairman and Secretary of the NSB. The proposed changes reflect functional responsibility and management level changes.

The functional responsibilities assigned to the Executive Director of Nuclear Activities as defined in revision 2 of the Consumers Power Company Quality Assurance Program Description for Operational Nuclear Power Plants are:

- a. Furnishing qualified personnel for participation in inservice inspection.
- b. Preparing and obtaining required review and approval of designs for minor modifications, as assigned. Determining, or participating in determination of methods to be used for verification of design adequacy, preparing test specifications and/or plans as required and confirming the results of such verifications.
- c. Preparing and obtaining required reviews and approval of purchase requests and providing approved procurement packages to Purchasing for action, as assigned.
- d. Providing required support in determining/monitoring of water chemistry.
- e. Providing necessary corrective action processing and status reporting for assigned corrective action documents, including offsite determination of NRC reportability.

- f. Providing technical support to the onsite and offsite review organizations and providing technical support for problem resolution and general office interfaces as described in plant technical specifications.
- g. Performing reactor engineering functions, such as fuel calculations and specification, fuel movement calculations, reactor thermal profile studies, etc.
- h. Operating the dosimetry laboratory (including preparation and maintenance of occupational radiation and exposure records).
- i. Maintaining the Emergency and Radiation Safety Plans.

The Executive Engineer - NAPO reports to the Executive Director of Nuclear Activities and performs those duties from the above list as directed by the Executive Director of Nuclear Activities.

The position of Executive Director of Nuclear Operations has been eliminated and the duties reassigned as described in Revision 3 to the Consumers Power Company Quality Assurance Program Description for Operational Nuclear Power Plants. This document also defines the functional responsibilities of the Executive Director - Nuclear Assurance Department (NAD) as:

- a. Establishing the Nuclear Operations QA Program.
- b. Continuing evaluation of QA Program status and adequacy, reporting his conclusions to Consumers Power Company Management.
- c. Assuring that verification activities are accomplished by personnel not directly responsible for the work being performed.
- d. Stopping unsatisfactory work to control further processing, delivery or installation of nonconforming materials or items.
- e. Recommending that a plant be shut down if such action appears necessary (the order is issued by the Vice President - Nuclear Operations or the Plant General Manager/Superintendent).
- f. Reviewing and concurring with organizational administrative procedures and procedure changes for compliance with nuclear operations QA Program requirements.
- g. Establishing NAD staffing levels based on workload analysis and experience of manpower versus task history.
- h. Routine attendance and participation at meetings of the Plant Review Committee.

The duties of the Director - Nuclear Safety, as defined in Revision 3 to the Consumers Power Company Quality Assurance Program Description for Operation Nuclear Power Plants, are:

- a. Performance of safety analyses.
- b. Performance of safety assessments.
- c. Performance of operating experience reviews.
- d. Performance of probabilistic risk assessment.
- e. Administrative and technical support for NSB activities.
- f. Technical support for onsite review activities.

The Director - Nuclear Safety reports to the Executive Director of Nuclear Assurance.

Revision 2 of the Consumers Power Company Quality Assurance Program Description for Operational Nuclear Power Plants specified that the Executive Director of Nuclear Activities reported directly to the Vice President of the Nuclear Operation Department. Revision 3 of this document specifies that the Executive Director of Nuclear Assurance reports to the Vice President of the Nuclear Operation Department. Thus, the management level occupying the chair position of the NSB would remain unchanged.

Based on the above information, the staff concludes that the proposed change in the chairperson of the NSB from the Executive Director of Nuclear Activities to the Executive Director of Nuclear Assurance is acceptable for the following reasons:

- a. The previously accepted level of management required to occupy this position remains unchanged.
- b. The functional responsibilities of the Executive Director of Nuclear Assurance are more compatible with the oversight functions of the NSB than those of the Executive Director of Nuclear Activities in that the former possesses a greater degree of freedom from cost and schedule considerations than the latter.

The proposed change in NSB composition from the Executive Engineer - NAPO to Director - Nuclear Safety is acceptable to the staff for the following reasons:

- a. While the Director - Nuclear Safety and the Executive Engineer - NAPO occupy the same management tier in the off-site organization, the Director position possesses greater management authority. Hence, this change will strengthen the management role in the NSB.
- b. By virtue of assigned responsibilities, the Director - Nuclear Safety is responsible for activities which are less directly line operational activities than those of the Executive Engineer - NAPO. Hence, greater independence is achieved.

2.6 Proposed Change to TS 6.5.2.8.1

Description of Change

Item c of this TS is being changed to reflect the NSB composition change from Executive Engineer - NAPO to Director-Nuclear Safety. Item g of this TS is being changed to reflect the titular change from NAPO to ISEG and to require ISEG attendance at special as well as scheduled PPC meetings.

Evaluation

The NSB composition change and the titular change from NAPO to ISEG were found acceptable as discussed earlier in this report. The added requirement for ISEG attendance at special PPC meetings increases the overall level of independent oversight of plant activities, represents an enhancement to safety, and is acceptable to the staff.

2.7 Proposed Change to Figure 6.2.1

Description of Change

The following changes are proposed to the offsite organization reporting to the Vice President of Nuclear Operations:

- a. The Midland General Manager position has been deleted.
- b. The Executive Director of Nuclear Activities position has been deleted.
- c. The Executive Engineer - NAPO position reporting to the Executive Director of Nuclear Activities has been deleted.
- d. The Director of Quality Assurance position has been deleted.
- e. The positions of Executive Director of Nuclear Planning and Administration and of Director of Nuclear Operations Training have been deleted from the figure but maintained in the organization.
- f. The position of Executive Director Nuclear Assurance has been added with the Palisades QA Director, the Big Rock Point QA Superintendent, the Director of Nuclear Safety, and the Director of QA Support reporting to him.

The following changes are proposed to the off-site organization not reporting to the Vice President of Nuclear Operations:

- a. The position of Executive Vice President to whom the Vice President of General Services reported was changed to Senior Vice President of Energy Distribution. On May 14, 1985 the licensee telephonically notified the reviewer that this position had subsequently returned to the Executive Vice President.

- b. The position of Vice President of General Services was changed to Executive Manager of General Services. On June 5, 1985 the licensee telephonically notified the Project Manager that this position had subsequently returned to the Vice President General Services.

Evaluation

With respect to the changes proposed to the organization reporting to the Vice President of Nuclear Operations, Revisions 2 and 3 of the Consumers Power Company Quality Assurance Program Description for Operational Nuclear Power Plans were reviewed to determine the distribution of functional assignments with the following results:

- a. The following duties formerly assigned to the Executive Director of Nuclear Activities are assigned as indicated:
 - 1. Inservice Inspection - Plant Superintendent
 - 2. Minor Modification Activity - QA Superintendent
 - 3. Purchase Requests/Procurement Packages - Executive Director - Nuclear Planning and Administration
 - 4. Water Chemistry - Plant Superintendent
 - 5. Corrective Actions/NRC Reportability - Director of Nuclear Licensing
 - 6. Technical Support to Onsite and Offsite Review Organizations - Director of Nuclear Safety
 - 7. Reactor Engineering - Plant Superintendent
 - 8. Operating the Dosimetry Laboratory - Plant Superintendent
 - 9. Emergency and Radiation Safety Plans - Executive Director of Nuclear Planning and Administration
- b. The Executive Engineer - NAPO duties have been reassigned to the Director - Nuclear Safety.
- c. All duties formerly assigned to the Director of Quality Assurance have been assigned to the QA Superintendent with the exception of attendance and participation at PRC meetings. This function has been assigned to the Executive Director of Nuclear Assurance.

The proposed changes to that part of the offsite organization not reporting to the Vice President of Nuclear Operations, documented in a licensee letter dated February 1, 1985, were reversed back to the original organizational titles. This reversal was telephonically transmitted and followed up in a licensee letter dated June 7, 1985. Therefore, these levels of management remain unchanged.

These changes are acceptable to the staff for the following reasons:

- a. All functional responsibilities have been retained either at the same management level or the next lower level. For those responsibilities assigned to the next lower management level, the responsibilities have remained in the same organizational framework.

- b. The Quality Assurance function has been consolidated. Access to upper management in the offsite Quality Assurance organization by the site Quality Assurance organization has been improved by elimination of the intermediate Director of Quality Assurance position.
- c. The NSB and ISFG have been strengthened by replacement of the executive Engineer - NAPO with the higher management Director of Nuclear Safety.
- d. The training responsibility shown on Figure 6.2-1 as it currently exists has been adequately retained in TS 6.4.2 despite the change to the figure.

2.8 Proposed Changes to Figure 6.2-2

Description of Changes

The title of the offsite Quality Assurance organization has been changed from Quality Assurance - Nuclear Operations Department Off Site to Nuclear Assurance Off-Site. The wording of Item A of the narrative portion of the figure was revised to establish consistency with the Palisades TS.

Evaluation

These changes are purely administrative, do not affect safety, and are acceptable to the staff.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment changes titles of individuals and groups and provides for administrative changes to clarify wording. The amendment also supports a reorganization of the Quality Assurance Program resulting in an elevation of reporting responsibility. Therefore, this amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. 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.

4.0 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ACKNOWLEDGEMENT

This evaluation was prepared by W. G. Guldemon and T. S. Rotella.

Dated: July 1, 1985