

CONSUMERS POWER COMPANY  
Docket 50-155  
Request for Change to the Technical Specifications  
License DPR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in the Facility Operating License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964, for the Big Rock Point Plant be changed as described in Section I below:

I. Changes

Administrative Controls:

Section 6.2.2.g (page 103a) (see attached changes)

Figure 6.2-2 (page 105) (see attached changes)

Section 6.5.1.2 (page 107) (see attached changes)

II. Discussion

The proposed Technical Specifications changes are requested to implement a reorganization of the Big Rock Point Plant staff. The purpose of the reorganization is to reduce levels (layers) of management in certain areas below the superintendent level; to provide additional analytical staff in the area of plant performance; to consolidate procurement and material services activities; to centralize plant planning activities; and to gain more coordination between maintenance and engineering functions. Although the present organization has worked well the reorganization will help further to improve the performance of the Big Rock Point Plant staff.

The staffing changes will continue to meet the guidance of ANSI N18.7-1976/ANS 3.2 and the specified proposed changes to the Technical Specifications do not reduce the expertise or qualification requirements for the Big Rock Point Plant staff.

The position of Operations and Maintenance Superintendent will be changed to that of Production and Performance Superintendent. The Production and Performance Superintendent will have responsibility for plant operations, reactor engineering and a new plant performance group. The reactor engineering function which currently is the responsibility of the Technical Superintendent in being aligned with operations in order to improve communications. In addition, reactor engineering is considered to be an activity that is more closely related to production than either plant maintenance or design. Both operations and reactor engineering will continue to report at the same level within the Organization, and the licensed operators and senior operators will continue to report directly to a member of management (the Operations Supervisor) holding a senior reactor operator license.

The position of Maintenance Superintendent will be changed to that of Engineering and Maintenance Superintendent and elevated to the level reporting directly to the Plant Superintendent. The Engineering and Maintenance Superintendent will have responsibility for mechanical, electrical and instrumentation and control maintenance as well as electrical, mechanical, civil and I&C engineering. The above engineering functions, which are currently the responsibility of the Technical Superintendent, are being aligned with maintenance in order to improve communications and coordination between the two functions and thereby enhance preventive and corrective maintenance activities. The engineering functions will continue to report at the same level in the management structure as in the current organization.

The new position of Planning and Administrative Services Superintendent is being created in order to coalesce the various planning and administrative functions at the plant under one manager. This position will have responsibility for planning, outage coordination (formerly a Operations and Maintenance Department responsibility), the Big Rock Point Living Schedule (formerly a Technical Department responsibility), property protection, overall materials management including procurement, spare parts and QLIST, and all other existing administrative duties. Major functional responsibilities reassigned to this position such as outage coordination, Living Schedule, fire protection and security will be retained at the same level of management as in the current organization.

The size of the plant review committee (PRC) will remain at ten (10) and will continue to be composed of the "key" plant staff members.

The authority of the Plant Superintendent to approve deviations from overtime restrictions has been modified to include the Production and Performance or Engineering and Maintenance Superintendents instead of the Operations and Maintenance or Technical Superintendents. These individuals have the principle supervisory responsibility for personnel in the functions covered by Technical Specification 6.2.2.g.

The proposed changes to the first and last paragraphs (operations to operators and be to been) are to correct typographical errors issued in Amendment 63 dated January 4, 1984.

In conclusion, Consumers Power Company considers the proposed changes to provide opportunity to further improve the performance of the Big Rock Point Plant without having any detrimental effects and request NRC approval.

#### Analysis of No Significant Hazards Consideration

The proposed Technical Specifications changes are requested to implement a reorganization of the Big Rock Point Plant staff. The purpose of the reorganization is to reduce levels (layers) of management in certain levels below the superintendent level; to provide additional analytical staff in the area of plant performance; to consolidate procurement and material services activities; to centralize plant planning activities; and to gain more coordination between maintenance and engineering functions.

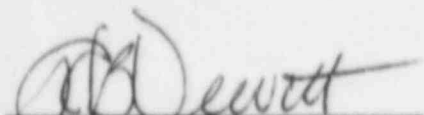
The change is expected to result in further improvements in performance of the Big Rock Point Plant staff. As such, the change should not involve a significant increase in the probability or consequences of an accident previously evaluated; create the possibility of a new or different kind of accident from that previously evaluated; or involve a significant reduction in a margin of safety as described in any Technical Specifications basis.

### III. Conclusion

The Big Rock Point Plant Review Committee has reviewed this Technical Specification Change Request and has determined that this change does not involve an unreviewed safety question and therefore involves no significant hazards consideration. This change has also been reviewed under the cognizance of the Nuclear Safety Board. A copy of this Technical Specification Change Request has been sent to the State of Michigan official designated to receive such Amendments to the Operating License.

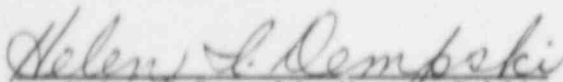
CONSUMERS POWER COMPANY

By



R. W. DeWitt, Vice President  
Nuclear Operations

Sworn and subscribed to before me this 5th day of August 1985



Helen I. Dempsey, Notary Public  
Jackson County, Michigan

My commission expires October 12, 1987.