

ATTACHMENT

Consumers Power Company
Big Rock Point Plant
Docket 50-155

PROPOSED TECHNICAL SPECIFICATIONS PAGE CHANGES

August 5, 1985

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ADMINISTRATIVE CONTROLS

- g. Administrative procedures shall be developed and implemented to limit the working hours of plant staff who perform safety-related operation functions; ie, senior reactor operators, reactor operators, auxiliary operators, health physicists and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:

- (1) An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- (2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
- (3) A break, including shift turnover time, of at least eight hours should be allowed after continuous work periods of 16 hours duration.
- (4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Superintendent or his alternate (Production and Performance or Engineering and Maintenance Superintendents), or higher levels of Management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime will be reviewed monthly by the Plant Superintendent or his designee to assure that excessive hours have not been assigned. Routine deviations from the above guidelines is not authorized.

CONSUMERS POWER COMPANY
PLANT ORGANIZATION

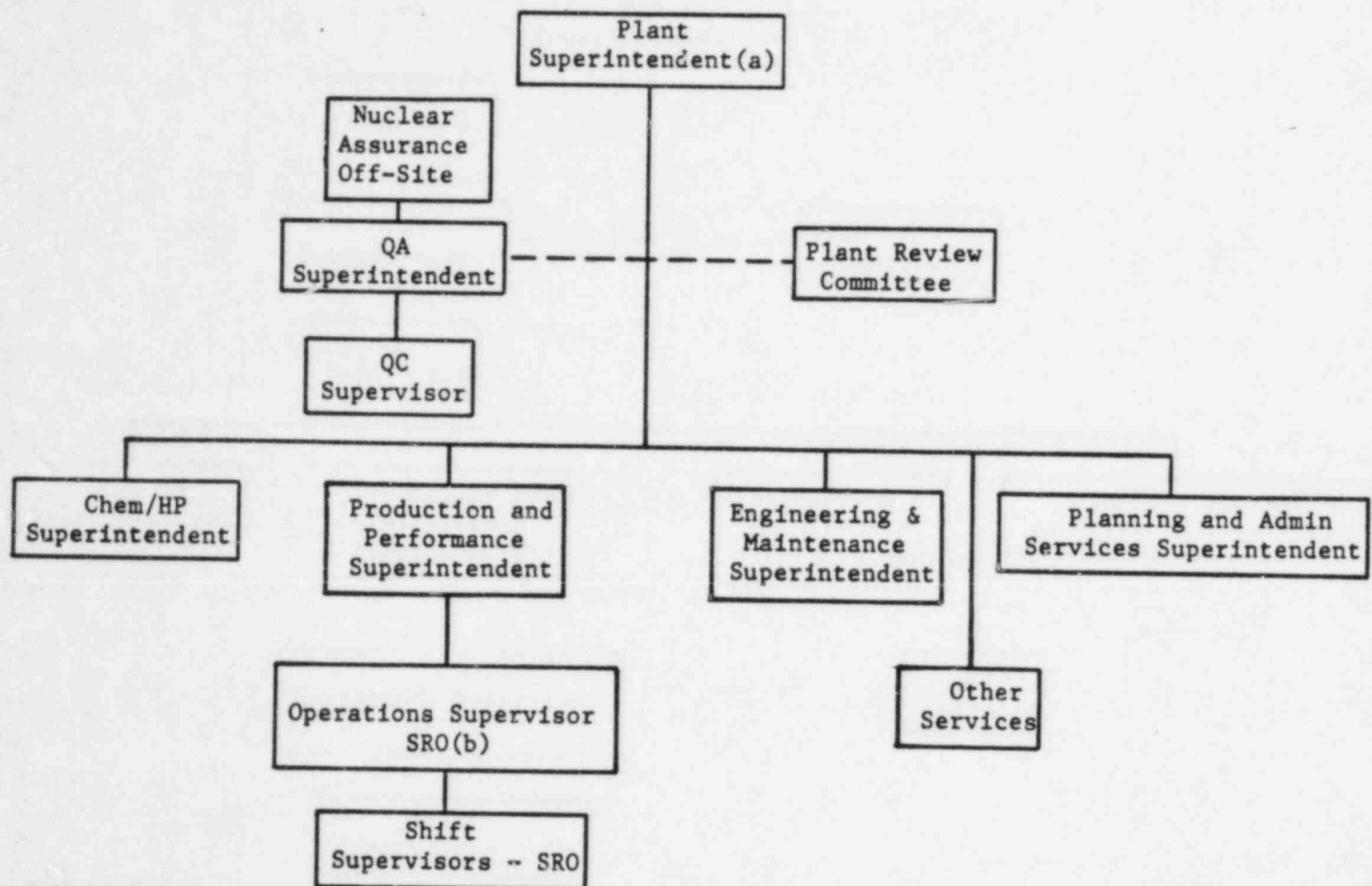


Figure 6.2-2

A. To support the above Plant organization, personnel knowledgeable in the following areas identified in ANSI N18.7-1976/ ANS 3.2 will report at the discretion of the Plant Superintendent:

1. Nuclear Power Plant Mechanical, Electrical and Electronic Systems
2. Nuclear Engineering
3. Chemistry and Radiochemistry
4. Radiation Protection (Reports to Chem/HP Superintendent)

A single individual may be qualified and perform in more than one discipline.

B. The Security Force will be supervised as described in the Plant Security Plan.

C. Quality Assurance/Control activities will be in accordance with Consumers Power Company's Quality Assurance Program Description for Operational Nuclear Power Plants (CPC-2A, as revised).

(a) Responsible for the Plant Fire Protection Program implementation.

(b) Either the Production and Performance Superintendent or the Operations Supervisor will hold an SRO and meet the other requirements of 6.3.1 of these Technical Specifications (as applicable to Operations Manager in ANSI N18.1). The individual holding an SRO shall be responsible for directing the activities of licensed operators.

(SRO - Senior Reactor Operator License)

Proposed

6.3 PLANT STAFF QUALIFICATIONS

- 6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.
- 6.3.2 Either the Chemistry and Health Physics Superintendent or the Chemistry and Radiation Protection Supervisor shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.¹
- 6.3.3 The On-call Technical Advisor (OTA) shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Director of Nuclear Operations Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR 55, Appendix "A."
- 6.4.2 The Director of Property Protection is responsible for the development, revision, approval and implementation of the Fire Brigade training program. This training shall, as practicable, meet or exceed the requirements of Section 27 of the NFPA Code-1975. Fire Brigade training drills shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW COMMITTEE (PRC)

FUNCTION

- 6.5.1.1 The Plant Review Committee (PRC) shall function to advise the Plant Superintendent on all matters related to nuclear safety.

COMPOSITION

- 6.5.1.2 The PRC shall be composed of:

Chairman: Plant Superintendent or Designated Alternate Appointed by the Plant Superintendent

Member: Production & Performance Superintendent

Member: Planning & Admin Services Superintendent

Member: Engineering & Maintenance Superintendent

Member: Operations Supervisor

Member: Instrument and Control Supervisor

Member: Reactor Engineer

Member: Chemistry and Health Physics Superintendent

Member: Shift Supervisor

Member: Technical Engineer

¹For the purpose of this section, "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) Formal schooling in science engineering, or (b) operational or technical experience/training in nuclear power.