



Consumers  
Power  
Company

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

October 21, 1985

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

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -  
DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
CONSUMERS POWER COMPANY TOPICAL REPORT CPC-2A, REVISION #5

NRC approval to revise our Topical Report, CPC-2A, sections 3.2.9 and Exception/Interpretation 15a is requested in accordance with 10CFR50.54. The following changes are proposed:

Change 3.2.9 to read:

"3.2.9 Persons representing applicable technical disciplines are assigned to perform design verifications. These persons are qualified by appropriate education or experience but are not directly responsible for the design. The designer's immediate supervisor may perform the verification provided that he did not specify a singular design approach, rule out certain design considerations, or establish the design inputs for the particular design aspect being verified; or provided that the supervisor is the only technically qualified individual available. In cases where a supervisor performs design review, such review is controlled either by a procedure approved in advance and reviewed by the Nuclear Assurance Department or is individually documented and approved in advance by the Supervisor's Management. QA audits cover the frequency and effectiveness of the use of supervisors as design verifiers to guard against abuse."

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J G Keppler, Administrator  
Big Rock Point and Palisades Plants  
Topical Report CPC-2A, Revision 5  
October 21, 1985

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Change Exception/Interpretation 15a to read:

15a RG 1.64, C2

Requirement

"Regardless of their title, individuals performing design verification should not (1) have immediate supervisory responsibility for the individual performing the design..."

Exception/Interpretation

CP Co follows the requirements of ANSI N45.2.11-1974, Section 6.1, with the additional requirements that, when not individually documented, a procedure shall control the use of supervisors to perform design reviews, and that QA audits cover frequency and effectiveness of this practice.

These changes are necessary to allow small organizational units the flexibility necessary to most efficiently accomplish their assigned functions. In addition, for some types of "design" work where both inputs and outputs are already severely restricted by the nature of the task, such as protective relay schemes and settings, the restrictions on supervisors as design reviewers may be counterproductive.

In any case, use of supervisors as design reviewers will be controlled by procedures, or individually documented, and will be subject to independent audit by the QA organization. We believe these changes do not, in fact, reduce the level of control or commitment from that contained in the current revision of CPC-2A. We none-the-less are requesting your prior review of this change, and will incorporate it into CPC-2A upon receipt of your approval.

*Kenneth W Berry*

Kenneth W Berry  
Director, Nuclear Licensing

CC Administrator, Region III, USNRC  
NRC Resident Inspector - Palisades  
NRC Resident Inspector - Big Rock Point

Attachments

ATTACHMENT

Consumers Power Company  
Palisades Plant  
Docket 50-255

PROPOSED TOPICAL REPORT CPC-2A, REVISION 5

October 21, 1985

3 Pages

Design reviews are performed by multi-organizational or interdisciplinary groups or by single individuals. Criteria are established to determine when a formal group review is required and when review by an individual is sufficient.

Unless otherwise stated, the verification of design addresses all information conveyed by the design document. When the verification is limited to certain areas or features, the scope or extent and any limitations on the verification are documented.

- 3.2.9 Persons representing applicable technical disciplines are assigned to perform design verifications. These persons are qualified by appropriate education or experience but are not directly responsible for the design. The designer's immediate supervisor may perform the verification provided that he did not specify a singular design approach, rule out certain design considerations, or establish the design inputs for the particular design aspect being verified, or provided that the supervisor is the only technically qualified individual available. In cases where a supervisor performs design review, such review is controlled either by a procedure approved in advance and reviewed by the Nuclear Assurance Department or is individually documented and approved in advance by the Supervisor's Management. QA audits cover the frequency and effectiveness of the use of supervisors as design verifiers to guard against abuse.
- 3.2.10 When designs must be released for use before they have been fully completed or before they have been verified, the incomplete or unverified parts of the design and the hold point to which work may proceed are identified. This hold point occurs before the work becomes irreversible or before the item is relied on to perform a safety-related function. Justification for such early release is documented.
- 3.2.11 Computer codes used in design are appropriately documented, verified, certified for use and controlled. Their use is specified.
- 3.2.12 Changes to design output documents, including field changes, are controlled in a manner commensurate with that used for the original design. Such changes are evaluated for impact. Those that affect fit, form or function are reviewed and approved by the same, or equivalent, organizations that approved the original design. Information on approved changes is transmitted to all affected organizations.

Exception/Interpretation

Records are suitably stored in steel file cabinets or on shelving in containers. Methods other than binders, folders or envelopes (for example, dividers) may be used to organize the records for storage.

14b. Sec 6.2

Requirement

"A list shall be maintained designating those personnel who shall have access to the files."

Exception/Interpretation

Rules are established governing access to and control of files as provided for in ANSI N45.2.9, Section 5.3, Item 5. These rules do not always include a requirement for a list of personnel who are authorized access. It should be noted that duplicate files and/or microforms exist for general use and backup.

14c. RG 1.88, C2

Requirement

"Two methods of protection of quality assurance records from the hazards of fire are described in Subdivision 5.6 of ANSI N45.2.9-1974. NFPA No 232-1975 . . . also contains provisions for records protection equipment and records handling techniques that provide protection from the hazards of fire. This standard, within its scope of coverage, is considered by the NRC staff to provide an acceptable alternative to the fire protection provisions listed in Subdivision 5.6 . . . When NFPA 232-1975 is used, quality assurance records should be classified as NFPA Class 1 records . . ."

Exception/Interpretation

CP Co adheres to ANSI N45.2.9-1974, Subdivision 5.6 for the facility for permanent storage of non-duplicated records. Temporary storage of documents after completion and during processing as records is in file cabinets selected in accordance with provisions of NFPA 232-1975 for Class 1 records (usually NFPA Class C, 1 hour or UL-Class 350).

15a. RG 1.64, C2

Requirement

Regardless of their title, individuals performing design verification should not (1) have immediate supervisory responsibility for the individual performing the design..."



Exception/Interpretation

CP Co follows the requirements of ANSI N45.2.11-1974, Section 6.1, with the additional requirements that, when not individually documented, a procedure shall control the use of supervisors to perform design reviews, and that QA audits cover frequency and effectiveness of this practice.

- 16a. RG 1.144, Sec C3a(1)

Requirement

This section requires that for operational phase activities, RG 1.33 "Quality Assurance Program Requirements (Operations)" are to be followed. One of the RG 1.33 requirements is that the results of actions taken to correct deficiencies that affect nuclear safety and occur in facility equipment, structures, systems or method of operation are to be audited at least once per six months.

Exception/Interpretation

See Item 3a for the exception to this requirement.

- 16b. Sec C3a(2)

Requirement

Applicable elements of an organization's quality assurance program (for "design and construction phase activities") should be audited at least annually or at least once within the life of the activity, whichever is shorter.

Exception/Interpretation

Since most modifications are straightforward, they are not audited individually. Instead, selected controls over modifications are audited periodically.