

February 8, 2001

EA-00-0286

Mr. Kurt M. Haas
General Manager
Big Rock Point Nuclear Plant
Consumers Energy Company
10269 US 31 North
Charlevoix, MI 49720

SUBJECT: BIG ROCK POINT INSPECTION REPORT 50-155/2001001(DNMS)

Dear Mr. Haas:

On January 25, 2001, the NRC completed an inspection at the Big Rock Point Nuclear Plant Restoration Project which examined decommissioning activities. The areas examined during this inspection were facility management and control, decommissioning support activities, and radiological safety. The enclosed report presents the results of this inspection.

Overall, reactor decommissioning activities were being performed satisfactorily. Radiological safety was being effectively conducted.

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We will gladly discuss any questions you may have regarding this inspection.

Sincerely,

/RA/

Bruce L. Jorgensen, Chief
Decommissioning Branch

Docket No. 50-155
License No. DPR-6

Enclosure: Inspection Report 50-155/2001-001(DNMS)

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-2-

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No: 50-155
License No: DPR-06

Report No: 50-155/2001-001(DNMS)

Licensee: Consumers Energy Company

Facility: Big Rock Point Nuclear Plant

Location: 10269 U.S. 31 North
Charlevoix, MI 49720

Dates: January 23-25, 2001

Inspectors: William G. Snell, Health Physics Manager
Michael M. LaFranzo, Radiation Specialist

Approved By: Bruce L. Jorgensen, Chief
Decommissioning Branch
Division of Nuclear Materials Safety

EXECUTIVE SUMMARY

Big Rock Point Restoration Project NRC Inspection Report 50-155/2001-001(DNMS)

This routine decommissioning inspection covered facility management and control, decommissioning support activities, and radiological safety. Overall, major decommissioning activities continued to be properly monitored and controlled.

Facility Management and Control

- Overall management of the facility, including staffing levels and the retention of trained personnel, appeared to be adequate. (Section 1.1)
- NPAD appeared to be effective in identifying, resolving, and preventing issues that degrade safety or the quality of decommissioning. (Section 1.2)

Decommissioning Support Activities

- Work sites were being well controlled and maintained in a safe manner. Based on the licensee's own assessment, onsite housekeeping needs to be improved. (Section 2.0)

Radiological Safety

- The licensee's staff possessed adequate knowledge and resources to ensure safe radiological work activities. In addition, documentation of the jobs reviewed appeared to be adequate to ensure compliance with NRC regulations. (Section 3.0)

Report Details

Summary of Significant Plant Activities

Since the previous inspection, the licensee began removing aggregate from the steam drum blowout panel, continued taking core borings as part of the effort to characterize the site source term, and continued with replacement/construction of the equipment lock bridge.

1.0 Facility Management and Control

1.1 Organization, Management, and Cost Controls (36801)

a. Inspection Scope

The inspector conducted reviews of ongoing plant activities, attended licensee meetings, and met with licensee management to assess overall facility management and controls.

b. Observations and Findings

On January 4, 2001, the Big Rock Point Site General Manager informed the site staff in a written release that the Big Rock Point Restoration Project would remain under the direct management of Consumers Energy. Consumers Energy had been considering whether they should transfer site management over to the Nuclear Management Corporation (NMC). A primary consideration in the decision to not turn management over to NMC was the desire to avoid distractions during calendar year 2001 with all the significant plant activities that would be taking place. The decision to turn site management for the Palisades Plant over to NMC from Consumers Energy had been made during 2000.

The inspector discussed with management staffing levels within the decommissioning organization. No concerns were identified regarding adequate staffing to implement the site radiological controls program, and to maintain safety and quality commensurate with decommissioning activities. Staff turnover appeared to be low, with trained and experienced personnel being retained.

c. Conclusion

Overall management of the facility, including staffing levels and the retention of trained personnel, appeared to be adequate.

1.2 Self Assessment, Auditing, and Corrective Action (40801)

a. Inspection Scope

The inspector conducted interviews, attended licensee meetings, and reviewed site documents to evaluate the effectiveness of licensee controls in identifying, resolving, and preventing issues that degrade safety or the quality of decommissioning.

b. Observations and Findings

Big Rock Point has an independent assessment team, the Nuclear Performance Assessment Department (NPAD), that works full time at the site. The NPAD group reports to the NPAD organization at the Palisades Nuclear Plant, and is comprised of a supervisor and two staff members. These individuals are assisted on approximately a monthly basis by personnel from Palisades as requested by the Big Rock Point NPAD Supervisor. Palisades NPAD personnel are typically brought up to conduct indepth assessments in areas beyond the level of expertise of the onsite NPAD staff. In addition, a periodic integrated audit is held which is comprised of a 10-person NPAD audit team from Palisades.

The NPAD staff attend all plant management meetings and most Safety Review Committee meetings. They sit in on pre-job briefs, review work packages, assess adherence to procedures, and evaluate technical documents. They cover both onsite contractors as well as Consumers Energy work groups. The NPAD staff have no predetermined areas they must review, but are free to evaluate whatever issues or areas they determine to be important. When an issue is identified, they will either document it in a Condition Report (CR), or request that the cognizant work group document the issue in a CR. On a monthly basis NPAD will issue a written report. The report is written for plant management and the Restoration Safety Review Committee (RSRC). The RSRC is an independent and outside review group that comes to the site three times a year to conduct an independent assessment.

Based on observations of NPAD personnel's participation in management meetings, a review of their monthly reports, and discussions with them during plant tours, it appears that they are effective in identifying issues in a timely manner and bringing them to management's attention for corrective action.

c. Conclusions

NPAD appeared to be effective in identifying, resolving, and preventing issues that degrade safety or the quality of decommissioning.

2.0 Decommissioning Support Activities

Maintenance and Surveillance (62801)

a. Inspection Scope

The inspector reviewed the quality and effectiveness with which the licensee was maintaining the site.

b. Observations and Findings

The inspectors conducted numerous tours of the site to assess general housekeeping and material condition, and to evaluate whether work sites were being maintained in a safe condition. Work sites were observed to be well controlled with appropriate barriers and signs during work activities and after work was stopped, and when personnel were no longer present. Work areas that were a potential safety hazard were clearly identified.

During a management meeting attended by the inspectors, management discussed the results of walk-arounds that they had performed the week before. The consensus was that general cleanliness and housekeeping had declined considerably. Possible solutions to address the problem had been generated prior to the meeting. Although no specific resolution was decided during the meeting on the most efficient way to address the problem, it demonstrated management's commitment to maintain a safe and clean work environment.

c. Conclusions

Work sites were being well controlled and maintained in a safe manner. Based on the licensee's own assessment, onsite housekeeping needs to be improved.

3.0 Radiological Safety

Training Program (83750, 36801)

a. Inspection Scope

An evaluation was conducted to determine licensee compliance with as low as is reasonable achievable (ALARA) principles and industrial safety standards relating to the licensee's training program. The evaluation focused on: 1) interviews with staff; 2) observations of staff performing activities; 3) interviews of supervisors and managers responsible for implementation of the training program; and 4) a selective review of documentation relating to the training program.

b. Observations and Findings

During the inspection, the inspectors directly observed several operations being conducted by licensee staff. These included: 1) the transferral of potentially contaminated aggregate from containment; 2) movement of radiologically contaminated material within several B-25 containers from a contaminated area to a non-contaminated area; 3) resin transfer; and 4) asbestos abatement of risers in containment.

The inspectors interviewed supervisors, Health Physics Technicians and workers connected with the above operations. The inspectors noted that each job was reviewed for ALARA considerations and pre-job briefings were provided daily prior to starting each operation. The inspectors also observed licensee staff relating to good ALARA practices and other safety related activities concerning each job. Activities reviewed by the inspectors included: 1) dose equalization techniques; 2) staff retreating to a low dose area when not directly involved in operations; 3) proper dress out techniques; 4) proper dosimetry assignment; and 5) general industrial safety practices. The inspectors did not observe any item which appeared to be contrary to good ALARA or industrial safety standards.

The inspectors interviewed supervisors and other managers concerning the training of staff for both classroom and on-the-job experience. The inspectors noted that the staff appeared to possess the appropriate training to ensure ALARA principles and general industrial and radiation safety practices were in effect during the various jobs.

The inspectors also selectively reviewed documentation concerning the jobs as stated above. Each job had appropriate reviews and controls to ensure compliance with NRC regulations.

c. Conclusions

The licensee's staff possessed adequate knowledge and resources to ensure safe radiological work activities. In addition, documentation of the jobs reviewed appeared to be adequate to ensure compliance with NRC regulations.

4.0 Exit Meeting

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on January 25, 2001. The licensee acknowledged the findings presented. The licensee did not identify any documents or processes reviewed by the inspectors as proprietary.

PARTIAL LIST OF PERSONS CONTACTED

Licensee

- K. Haas, General Manager
- R. McCaleb, NPAD Supervisor
- K. Pallagi, RP & ES Manager
- G. Petitjean, Licensing Supervisor

INSPECTION PROCEDURES USED

- IP 36801 Organization, Management & Cost Controls
- IP 40801 Self Assessment, Auditing, and Corrective Action
- IP 62801 Maintenance and Surveillance
- IP 83750 Occupational Radiation Exposure

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS USED

ALARA	As Low As Is Reasonably Achievable
CR	Condition Report
NMC	Nuclear Management Corporation
NPAD	Nuclear Performance Assessment Department
NRC	Nuclear Regulatory Commission
RP&ES	Radiation Protection & Environmental Services
RSRC	Restoration Safety Review Committee

LICENSEE DOCUMENTS REVIEWED

Licensee documents reviewed and utilized during the course of this inspection are specifically identified in the "Report Details" above.