CONSUMERS ENERGY

BIG ROCK POINT

RESTORATION SAFETY REVIEW COMMITTEE

Meeting 2004-01

June 17, 2004
Visitor Center
Big Rock Point

Minutes written by:

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June 30, 2004

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Chairman, RSRC
July 6, 2004

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BIG ROCK POINT
RESTORATION SAFETY REVIEW COMMITTEE
MEETING 2004-01 SUMMARY

The Restoration Safety Review Committee met on June 17, 2004 at Big Rock Point to discuss the performance of the Big Rock Point Restoration Project with the site staff. Attending the meeting were the RSRC members and the Big Rock Point Project staff providing presentations. Jack O'Hearn the new BNFL-Inc. Project Manager also participated in the meeting. The three RSRC subcommittees and the Independent Safety Review Group met on June 16, 2004. No action items were identified during the meeting.

Highlights and topics discussed included:

This was the first meeting convened with the reduced RSRC membership. The revised RSRC retains Bill Manion as RSRC Chair and Management and Control Subcommittee Chair, Ted Borst as the Radiation Safety and Environment Subcommittee Chair and Jim Pomaranski as the Technical and Spent Fuel Safety Subcommittee Chair.

Bill Manion called the meeting to order at 8:30 AM with all members present. After his welcoming comments Kurt Haas, Big Rock Point Site General Manager, provided a brief overview of the site activities since the last RSRC meeting held in October 2003. Kurt began by paraphrasing several comments from the last meeting:

Safety	*Important things are happening every day.*
Bottom Line	*Stay connected and communicate.*

Kurt noted that the site came away from the last meeting with the feeling performance in the safety arena was not as good as the site had perceived. He briefly reviewed the major hardware advances made in the last 9-months which included: the shipment of the reactor vessel and steam drum; decontamination and survey of the turbine building (on-going); installation of the water control systems (monitoring wells and retention pond, and the evaporation process for contaminated water); the spent fuel pool initial dismantlement and the first mixed waste shipment to Florida. On the software side of business Kurt discussed the progress made with the NRC review of the License Termination Plan with the RAI submittal scheduled for the end of June; revisions have been approved for the Technical Specifications, the FHSR and CPC-2A; and the MPSC 3-year update was submitted.

Kurt discussed the challenges of getting through the winter and that the site is entering into the toughest part of the project with respect to working conditions. He further discussed the site goal of reducing recordable injuries from 9 to 4 and the development of the Safety Action Plan. Kurt then summarized the injuries reported to date. After two recordable injuries in January, an off-site stand-down meeting was held to discuss the

importance of construction and radiation safety. As of the RSRC meeting the site had six recordable injuries. The workers appear to know what is expected but short cuts are being taken. First and Second line Supervision appear to be pushing production over safety. There also appears to be the feeling in the work force that safety and efficiency are at odds. Recent items identified for improvement include:

- Stopping a job and listening to a worker's concern and asking clarifying questions to get to the root of the concern.
- Site housekeeping needs to improve providing a safer work environment.
- The addition of a Safety Professional to the site staff is being pursued.
- The site is moving toward stronger action, potential disciplinary, for safety violations. Up to now the site has been too forgiving concerning violations.
- The safety organization may report directly to the SGM in the future.

Kurt discussed in brief the overall site schedule and project cost. The current schedule shows a site release date of September 2006, slightly later than previous estimates. The turbine building work resulted in a lot of lessons learned. There is an indication that the activated concrete in containment is not the only remaining contributor to the background radiation field. The project cost estimate came in lower than the previous estimate. This is tempered by the effect of the poor market performance on the decommissioning fund. CMS has indicated that the company will cover any shortfall in the fund and seek a true up from the MPSC at the end of decommissioning in 2006. Kurt stated that one of the challenges for the site is balancing the schedule cost versus the cost of waste disposal. Kurt included as a challenge to the site the timely receipt of information from sub-contractors regarding their dismantlement techniques and schedule. This leads to delays in site planning activities.

Kurt also discussed the recent NRC inspection results. The inspectors spent a lot of time looking at industrial safety and contamination control. The inspector stressed that we must continue to take critical looks at performance and maintain a strong over-sight of the contracted work.

DEPARTMENTAL REPORTS

Radiation Protection and Environmental Services

Ken Pallagi and Tracy Goble presented an update on the effort to resolve the issues surrounding the tritium contamination found beneath the turbine building floor. In the LTP submittal, the resolution of the tritium was left purposefully vague, as detailed information was not available at the time of submittal. Not unexpectedly the questions received from the NRC dealt primarily with tritium related issues. Several conference calls were held between the site staff and the NRC to address the questions and share information gained while their review was in progress. Currently, the revisions to the LTP prompted by the NRC questions have been incorporated and the LTP has been

distributed for site review. The tritium appears to be contained within a subterranean vault that comprised part of the turbine foundation. The vault appears to be sealed and filled with sand. There are penetrations for the circulating water lines. All monitoring well data has been trending down for tritium concentrations. Six new monitoring wells were installed June 2006 at the request of the NRC to help validate their computer model.

Following the tritium discussion Ken updated RSRC on the status of the mixed hazardous waste shipments. To date 8100 pounds of mixed hazardous waste have been shipped with about 600 pounds remaining. Ken noted that quality issues associated with the Florida based waste handler were never completely resolved. Consumers, therefore, requires company representation at the facility when the vendor begins to process the waste. Other topics discussed were the QVA area remediation and the upcoming discharge canal survey. Containment interior coatings resolution is looming as a potential risk. Paint samples of the sphere interior coating showed two of 14 contained PCB levels above the EPA limit. However using the EPA evaluation criteria the coatings could be considered non-PCB containing. The EPA is hesitant to accept the evaluation. Discussions have continued between Ken and the EPA representative to help resolve the issues.

Ken also discussed briefly the accumulated site dose, showing by graph how the actual dose is tracking with the ALARA goal with the exception of the increase caused by the added reactor vessel removal work. The overall dose remains well below estimated total. Ken then went on to discuss three Level 2 condition reports that were issued relating to radiation protection. Ken concluded his discussion with an update on the bulk material shipments made to the Waters Landfill. 143 shipments have been made totaling approximately 7.7 million pounds of debris. Shipping of the waste had recommenced on June 14, following the winter shutdown. Ken noted that there has been an excellent working arrangement with the independent reviewer, the landfill, Consumers and the State of Michigan.

Quality Program/ NPAD

Rob McCaleb reviewed the recent changes made to the quality program including: NRC approval and issuance of Revision 21 to CPC-2A; the completion of BNFL quality related activities and the de-activation of their quality plan; NRC approval and issuance of amendment 125 to the plant Technical Specifications; the recent completion of the ISFSI Administrative Procedures with their issuance pending training of applicable site employees; and the reductions made to the NPAD staff during 2003, from 3 full time employees to one with only a part time site presence. Rob briefly touched on several projected changes involving the quality program including elimination of the Defueled Technical Specifications, additional revisions to CPC-2A, and refinement/revision to the ISFSI Administrative procedures as they become implemented.

Rob discussed two audits that have occurred between RSRC meetings. The overall decommissioning audit was completed late in 2003. The scope of the audit included

radiological protection activities, ISFSI operations and conformance with Technical Specifications. The audit reported no significant conditions adverse to quality and noted that activities were generally well controlled. There were several instances noted of procedural non-compliance and examples of an inappropriate level of informality. Specifically cited were failure to control Important-To-Safety work at the ISFSI with a work order, radiological environmental monitoring and effluent sampling deficiencies, and an overly informal work request screening process. The site has already taken steps to strengthen the identified weaknesses.

The second audit was performed jointly with Palisades regarding the off-site storage of records at the Traverse City Service Center vault. No significant conditions adverse to quality were identified. The audit discovered that the psychrometer, used to measure vault temperature and humidity levels had exceeded its calibration. Also identified was the potential for flooding from the room air conditioner. The psychrometer issue has been resolved and Palisades is following resolution of the flooding issue.

Rob concluded by discussing the Employee Concerns program. There have been no new concerns raised with the NRC regarding Big Rock Point. There was one issue raised on-site with an asbestos issue. The site promptly reviewed the existing program and provided upgrades.

Human Resources and Security

Ellen Zienert provided RSRC a review of the safety statistics. As Kurt mentioned in his overall review, the site has experienced six recordable injuries to-date. There were two back injuries reported in January, a hernia in March, and in May a back injury, one knee injury and one hand injury. Of the six injuries two required surgery and one involved a broken bone. All injured employees were placed on restricted duty following their return to work. Ellen discussed the use of Focus Groups to receive input from workers for improvements to site safety. A safety consultant was brought in to provide detailed observations of site safety. In addition the site is instituting increased field inspections by union leadership and corporate safety. Ellen then went into portions of the Safety Action Plan, several of the actions identified were; increased manager presence in the field, institution of a safety recognition program and the addition of a safety professional to the full time site staff. Based on input from the focus groups the following have been implemented: first aid kit locations updated and assignments made for restocking, an end of job safety review, operations implemented a daily safety walk down at 0400 hrs with a report provided at the 0600 daily meeting, and exit lighting from the SAC was improved. Ellen also briefly discussed the set of Safety Core Rules that has been drafted and are out for review.

Ellen provided a discussion of site staffing plans. Currently there are 66 Consumers staff members (includes two summer interns). There has been a slow attrition of employees during the past year. Several have retired, several have transferred to other Consumers locations, and one was laid-off. An additional three are slated for lay-off by the end of

the year. By the end of 2005 there will be only 11 Consumers Energy staff members on-site. Of the current 18 exempt employees on-site in 2005, six are eligible for retirement. Of the six non-exempt employees, two are eligible for retirement.

Engineering, Operations and Licensing

Greg Withrow discussed several of the major activities completed by Licensing since the last RSRC meeting. These items had previously been discussed during Kurt's opening summary so this discussion was brief. The items included; issuance of the revised CPC-2A and the Q-list, License and Technical Specification revisions and a UFHSR revision. Greg also touched on the response to the NRC RAIs on the LTP that was being completed. Greg also provided a discussion on the status of a recent Emergency Plan change submittal. Part of the revision proposed by the site involved eliminating the ALERT emergency classification, keeping only the NOTIFICATION OF AN UNUSUAL EVENT. Based on the response by the NRC reviewers, the site is resubmitting the revision maintaining the ALERT classification.

Regarding the Operations Department, Greg discussed the two methods of water control. Depending on the source, water is either evaporated or pumped to the discharge ditch on the west side of the site. Potentially contaminated water from inside the buildings is placed in barrels and transported to the evaporation system where barrel heaters are used to evaporate the water. An installed HEPA unit is utilized to filter the building exhaust when water is being processed. Water from monitoring wells inside the slurry wall and that collected from building excavations is pumped through a flocculation system into a retention pond for settling and then pumped to the ditch on the sites western boundary. The water is monitored for radiation prior to discharge to the ditch. Monitoring wells outside of the slurry wall are discharged directly to the ditch. Greg also described in general terms the installation of the electrical generator at the ISFSI building. While not required the generator was installed due to several recent power outages that had occurred in the area.

Greg also mentioned the effort the engineering department put into rewriting the administrative procedures into an applicable set for the ISFSI. Through consolidation a set of eight essential procedures were created. The writers extracted guideline material into several handbooks for user reference. The procedures have received SRC review and user training has been initiated. Once training is completed the procedures will be issued for use. In conjunction with the procedure re-write, Greg also presented a list of required ISFSI functions that need to be satisfied. As staff reductions occur, these functions must be either re-assigned to other employees or potentially contracted out. Consumers Energy management is in the process of formalizing an ISFSI management strategy.

Construction, Scheduling and Dismantlement

Al Simonti provided the review of the site schedule and budget. The current projection for the site to complete the Final Site Survey is September 27, 2006, which is about two weeks later than the March 2004 MPSC submittal date. Al briefly went through a list of the schedule adjustments that have occurred. Delays on finishing the turbine building included system remnant removal, scabbling surfaces, asbestos around pipe sleeves and learning how to perform the detail survey packages and documenting the results. Lessons learned from the turbine building are being transferred to the containment building packages. Al discussed several of the major activities that have recently been initiated and those scheduled to begin within the next six months. Items recently initiated included plugging the intake line, cofferdam installation in the discharge canal, and discharge canal remediation. Items to begin included ion tube removal, activated concrete removal, screenhouse and turbine building demolition and the stack segmentation. Al mentioned that one of the concerns with upcoming scheduled activities is a lack of detailed information from the sub-contractors that the site would like for planning activities. Getting the detail information late in the game results in rushed planning and the need for last minute changes that can lead to delays.

BNFL Activities

Jack O'Hearn introduced himself to the RSRC members, as he had just been assigned to the project when the RSRC met last. Jack began by reviewing the BNFL site safety statistics. In the last 36,000 work-hours the BNFL crew has recorded only three first aid injuries, zero days away from work and zero OSHA recordable injuries. BNFL has performed 215 work site safety surveillances. Jack discussed the BNFL ALARA performance and planned improvements. Jack also discussed several of the recent activities by BNFL including; steam drum removal completion, turbine building and spent fuel pool decontamination, that they are currently working on activated concrete removal and the screenhouse demolition. Included in this work was the installation of the containment building gantry crane by Barnhart. Jack then mentioned several of the CMS/BNFL achievements that have occurred. Most notably was the agreement between the two organizations on how the turbine building work was performed. Rather than have each organization perform their contractually obligated work in each room, each organization agreed to all the work required on a room-by-room basis. This minimized the mobilization and demobilization costs associated with each organization performing only their required work in each room.

RSRC Meeting Summary

The Chairman thanked the site organization for their openness and comments. He stated that the site is taking an admirable approach to working themselves out of a job and that it doesn't appear that people are taking their eye off the ball.

Ted Borst

Ted offered the following positive comments during his summary:

- Improvements in the RP organization with an increased emphasis on Bulk Material Release.
- Addition of the on-site tritium analysis capability.
- A schedule coordinator in RP.
- The self identified adverse trends in the RP practices and issuance of the Condition Report.
- Interaction with the NRC on the LTP phone calls to resolve their RAIs.
- Good BNFL presentation, which seemed to be open and honest.
- Appears we have a good tritium analysis/review and trending program.

Ted also offered the following observations:

- Maintain control of the radioactive material.
- Based on the tent being used for concrete overburden removal an improved design will be necessary when work begins on the activated concrete [*note: BNFL is planning on using a commercially available tent rather that the plastic sheeting and scaffold tent currently used*].
- The remediation building is "unnerving" for activated concrete work [*note: the remediation building is only for overburden concrete remediation, activated concrete blocks are placed directly in containers for shipment*].
- Staying connected with the EPA with respect to the PCB containment paint issue.

Jim Pomaranski

Jim offered the following observations during his summary:

- The pre-job brief for the divers going into the inlet crib and pipe-way was very detailed with the workers engaged in the meeting.
- There was a strong compliance with PPE usage, hard hats, glasses and hearing protection when necessary.
- The site needs to stay on top of ladder usage. As the buildings are being demolished ladder usage would be expected to increase.
- Site housekeeping appeared adequate, but could be better. Keep an emphasis in the pre-job brief on the importance of housekeeping and keeping control over cords, hoses and loose material.
- He liked the BNFL presentation especially the focus on personnel and radiation safety.

Bill Manion

Highlights of Bills summary are listed below:

- NPAD continues to show an excellent on-site presence and continues to enjoy a solid working relationship with the site.
- The corrective action system and employee concerns programs are "stable and unremarkable" (Bill stated that this is a praiseworthy comment).
- The site as a whole is under the NRC guidance for total dose, the condition report on adverse trends provided a good heads-up.
- Safety Action Plan had some good items: use of focus groups, outside consultant review, increased management presence in the field, and adding another safety professional to the staff.
- Licensing seems to be maintaining good communication with the NRC, again "stable and unremarkable".
- Appears to be good forethought into long term ISFSI Management, continue on.
- BNFL provided a good presentation, encourages getting detailed work plans to the site for their planning purposes.
- The schedule of activities looks very challenging over the next year, stay on top of things.
- Bill encourages the use of an independent calculation for critical calculations like those for the concrete block rigging analyses (BNFL confirmed that its calculations receive an independent review).

Bob Fenech

Bob offered three comments:

- There was a lot of good discussion revolving around safety. Appears that the message is getting out, PPE usage appears good.
- Working aloft is becoming an issue, must maintain tight controls.
- Site needs to get out the message of what is tolerable safety behavior and what is not.
- Work area planning appears to be weak. Need to get information from sub-contractors sooner in order to provide effective planning, from a site perspective.

Following Bob's summary comments the meeting concluded. Bill Manion thanked the site again for their cooperation and for making RSRC's job easy.

Action Items

There were no action items identified during the meeting.

Attachment 1
ISRC Meeting Summary

The ISRC met on the morning of June 16, 2004. The IRSC performed the functions as described in the Quality Description for Nuclear Power plants, Part 1, Big Rock Point Nuclear Power Plant, Appendix C. The committee reviewed outstanding comments on reviewed documentation including 50.59 and 72.48, by each of its members and required no further evaluation. The committee also reviewed the Annual Big Rock Point Corrective Action Process Performance Review for 03/26/03 through 03/31/04 and offered no comments.

The following recommendations were offered:

1. The SEP revision should have a pre-submittal concurrence from ISRC.
2. The LTP and RAI response were covered such that post-submittal review was considered acceptable.
3. ISRC requests that operating experience be sent to them directly for a determination of applicability and its disposition.
4. The Health and Safety data (i.e. silica air sampling results) should be posted for site employees to be aware of.