

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-155/79-07

Docket No. 50-155

License No. DPR-6

Licensee: Consumers Power Company  
212 West Michigan Avenue  
Jackson, MI 49201

Facility Name: Big Rock Point Nuclear Plant

Inspection At: Big Rock Point Site, Charlevoix, MI

Inspection Conducted: April 23-25, 1979

Inspector: *M. J. Oestmann*  
M. J. Oestmann

6/8/79

Approved By: *A. B. Januska*  
T. H. Essig, Chief  
Environmental and Special  
*for* Projects Section

6/12/79

Inspection Summary

Inspection on April 23-25, 1979 (Report No. 50-155/79-07)

Areas Inspected: Routine, unannounced inspection of environmental protection and monitoring program results; and emergency planning relating to coordination and agreement with offsite support agencies; facilities, equipment, and procedures; review of records of tests, drills, and training; and licensee internal audits. The inspection involved 19 inspector-hours on site by one NRC inspector.

Results: Of the eight areas inspected, no apparent items of noncompliance or deviations were identified.

460 240

7908010 074 Q

DETAILS

1. Persons Contacted

Principal Licensee Employees

- \*J. Rang, Director, Operation and Maintenance (BRP)
- \*T. Brun, Chemistry and Radiation Protection Supervisor (BRP)
- \*C. Axtell, Plant Health Physicist (BRP)
- \*G. Gilbody, Quality Assurance Engineer (BRP)
- R. Doan, Training Supervisor (BRP)
- G. Fox, Health Physics Technician (BRP)
- K. Brooks, Health Physics Technician (BRP)
- M. Dickson, Senior Engineering Technician (CP)

The inspector also interviewed eight other licensee employees, including health physics technicians, security guards, and office personnel.

\*Denotes those present at the exit interview.

Offsite Agencies

- J. Curtis, Chief, Charlevoix Fire Department
- G. Lasater, Sheriff, Charlevoix County Sheriff's Department
- C. Thompson, Fireman, Charlevoix Fire Department
- W. Miller, Lieutenant Commander, Coast Guard, Charlevoix
- R. Rasmussen, Captain, Coast Guard, Charlevoix
- I. Seidel, Inservice Director, Charlevoix Hospital
- A. Tunison, Coordinator, Charlevoix County Emergency Services  
Disaster Agency
- J. Bennett, RN, Charlevoix Hospital
- R. Kueger, RN, Charlevoix Hospital
- C. Smith, RN, Emergency Room Supervisor, Northern Michigan  
Hospital, Inc., Little Traverse Division, Petosky
- J. Page, Ambulance Driver, Petosky Fire Department
- A. Bateman, Acting Chief, Petosky Fire Department

2. General

The inspection included an examination of the licensee's environmental monitoring and emergency planning programs.

The environmental monitoring portion of the inspection involved an examination of the radiological environmental activities, monitoring results, management controls and quality control of analytical measurements. The licensee conducts an additional radiological environmental monitoring program beyond the film monitoring program required by Section 6.4.2.(c) of the Technical Specifications.

The emergency planning portion involved examination of the Big Rock Point Site Emergency Plan (Revision No. 48, April 11, 1979) and available implementing cards. The inspector held discussions with licensee representatives, visited selected offsite support agencies, reviewed documentation pertaining to logs and records of emergency supplies and inspected selected emergency equipment and supplies for emergency preparedness.

3. Environmental Monitoring

The inspector reviewed the licensee's environmental monitoring program for CY 1978. <sup>1/</sup>The program has remained the same since the last inspection.

a. Film Monitoring

The inspector examined the licensee's film monitoring program for CY 1978 in accordance with compliance to Section 6.4.2.(c) of the Technical Specifications. Five film monitoring stations were visited during a tour of the site. The exposed films are sent to the licensee's contractor, Radiation Detection Company in California, for measuring the exposure dose. The inspector reviewed the licensee's procedure RP-32, Revision 0 "General Radiation Protection Procedure Environmental Dosimetry" which describes placing, collecting and shipping of the films to the contractor. The inspector also examined the CY 1978 monitoring results and observed no unusual results or trends.

b. Voluntary Radiological Environmental Monitoring Program

A voluntary radiological environmental monitoring program not required by the Technical Specifications, is conducted by the licensee. The inspector toured three randomly selected air sampling stations and found them to be operational. The inspector also observed TLD's at five stations. The licensee has been conducting an evaluation of the use

<sup>1/</sup>IE Inspection Rpt No. 50-155/74-04.

of TLD's. The licensee also samples milk, lake and well water, algae, fish and periphyton.

The inspector reviewed monthly reports of the results from the licensee's contractor, Eberline Instrument Company, and observed no unusual trends or anomolous results, except for fallout effects from the atmospheric weapons testing by the Republic of China in the spring of 1978. The licensee did report in Licensee Event Report LER-RO-78-032 on September 15, 1978, that contaminated demineralized water was used to rinse the sampling hardware and thereby contaminated the lake water samples taken from July 26 to August 22, 1978. The results therefore were not valid.

The trend reports covering the periods from 1968 to date were also examined. The inspector also reviewed the contractor's Laboratory Procedures Manual, dated June 1977, and the licensee's procedure for Radiological Environmental Sample Collection, Revision 1. No problems were identified.

c. Environmental Monitoring Audits

The licensee conducted a quality assurance audit of the licensee's contractor performance for 1978 and observed no significant problems. This contractor also participates in the EPA interlaboratory cross check program and conducts its own internal audits to ensure a high degree of reliability in analytical measurements. The inspector reviewed the contractor's Quality Assurance Manual, dated September 15, 1978, and identified no significant problems.

The licensee also conducted an internal audit on October 23-25, 1978, and found no findings of safety significance pertaining to the environmental monitoring program.

No apparent items of noncompliance or deviations were identified.

4. Emergency Planning

a. Management Controls

The inspector examined the licensee's management controls, delegation of responsibilities, authorities and administration of emergency planning and preparedness. C. Axtell,

the Plant Health Physicist, is responsible for the licensee's emergency planning activities and coordination. He is responsible for updating the Site Emergency Plan and implementing cards. The current revision is Revision 48 dated April 11, 1979.

b. Coordination with Offsite Support Agencies

The inspector visited the Charlevoix Fire Department which also provides ambulance service; Charlevoix County Sheriff; Charlevoix County Emergency Services Disaster Agency; the US Coast Guard in Charlevoix; Charlevoix Hospital; Northern Michigan Hospital, Inc., Little Traverse Division; and the Petosky Fire Department to determine if coordination between the licensee and the support agencies is being maintained. The representatives stated that coordination and training with the licensee have been adequate and the agencies have been well informed as to their responsibilities in the event of emergencies at the plant. The licensee has provided emergency planning and radiation protection training sessions to the fire departments including ambulance personnel in Charlevoix and Petosky, on October 3, 1978, the two hospitals on May 5, 23, and 30, 1978, state police, on August 14, 1978, and the Coast Guard personnel on August 28, 1978. The retraining of the Petosky Fire Department personnel was provided on April 7<sup>2/</sup>, 1978. This item was discussed in a previous inspection.<sup>2/</sup>

In the review of letters of agreement, the inspector noted that the licensee obtained new letters from the Charlevoix County Sheriff, dated March 29, 1978, and the Petosky Fire Department, dated April 26, 1978, in response to items discussed in the previous inspection.<sup>3/</sup> The Michigan Department of State Police contacted the licensee on September 6, 1978, clarifying and updating the State's policy of activation of the Michigan Preparedness Plan. This was further verified in a letter to the licensee from the Charlevoix County Emergency Services Coordinator dated September 11, 1978. The licensee had deleted the State's Plan from the licensee's Plan in April 1978. In addition, the letter of agreement between the Charlevoix Township Fire Chief and the licensee was updated November 11, 1978. All letters of agreement have a clause extending the term of the agreement from year-to-year from the date of issuance

<sup>2/</sup>IE Inspection Rpt No. 50-155/78-03.

<sup>3/</sup>Ibid.

unless terminated as provided therein, thus eliminating the need for annual updating of the letters.

No apparent items of noncompliance or deviations were identified.

c. Facilities, Equipment and Implementing Procedures

The inspector checked the emergency kits located in the machine shop, the Service Building Annex, and the control room, and found that the portable air sampler in the Service Building Annex was missing. The April 1979 inventory indicated it was present in the kit. This is an open item.

Emergency supplies at the hospitals were examined. An inventory sheet was provided with the emergency kit lockers. All items were present. Review of the emergency kit inventory sheets for CY 1973 and first quarter of CY 1979 indicated that the contents were as required and the kits inspected on the prescribed frequency.

The stack gas and off-gas monitor were examined in the control room and found to be operational. They are functionally checked daily for operation. In addition, the stack gas monitor response is checked using a source and the off gas monitor using electronic means. The off-gas monitors are alarmed, and the response versus activity concentrations are posted near the monitor.

The inspector examined the licensee's implementing cards and found them current. The Plant Health Physicist had conducted his quarterly review of the cards which were updated on April 11, 1979. The licensee was in the process of distributing the updated changes to the Plan and the cards at the time of the inspection.

No apparent items of noncompliance were identified. One apparent deviation was identified.

d. Tests, Drills and Training

The inspector reviewed the licensee's records and internal correspondence pertaining to tests and drills conducted during CY 1978. The inspector noted that the semiannual drill for the latter half of 1978 was not conducted in accordance with Section 9.10.1 of the Site Emergency Plan

until January 5, 1979. The inspector discussed keeping on schedule with the licensee representatives. The licensee stated he has the flexibility of not exceeding 25% of the scheduled frequency in surveillance testing. This is an open item and will be examined during a subsequent inspection. In addition, the inspector observed that documentation on the critique of the medical drill held on May 24-25, 1978 was missing. The licensee stated that, in the future, documentation of critiques of each drill will be provided.

Training records for site personnel and selected offsite agencies were reviewed by the inspector and were found to meet the requirements of Section 9.9 of the Site Emergency Plan.

No apparent items of noncompliance or deviations were identified. However, holding drills on a semiannual frequency remains an open item.

e. Audits

The inspector reviewed a licensee internal quality assurance audit record of emergency planning dated September 11, 1978. Seven findings and thirteen observations were obtained. One of the findings involved missing air sampler in the emergency kit in the Service Building Annex. This item was discussed in Paragraph 4.c above. The inspector discussed these findings and determined at the time of the inspection that corrective actions had been accomplished on each item.

No apparent items of noncompliance or deviations were identified.

5. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on April 25, 1979. The inspector summarized the purpose and scope of the inspection and the findings. With regard to the open items the licensee said they would look into the matter.

460 248