



Consumers
Power
Company

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

August 11, 1980

Mr James G Keppler
Office of Inspection and Enforcement
Region III
U S Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - ADDITIONAL
RESPONSE TO HEALTH PHYSICS APPRAISAL -
IE INSPECTION REPORT 80-04

By letter dated July 18, 1980, Consumers Power Company responded to the Big Rock Point Plant IE Inspection Report 80-04, Health Physics Appraisal. Our response did not consider Item 1 of the report to be a valid item of noncompliance. As a result of several telephone conversations with Mr L R Gregor of your staff, it is necessary to clarify our position as follows:

Consumers Power Company does not agree that Item 1 of IE Inspection Report 80-04 for the Big Rock Point Plant is an item of noncompliance. Our position is that Technical Specification 10.6.2.2.(d), which requires that an individual qualified in radiation protection procedures shall be onsite when fuel is in the reactor, has been consistently implemented during backshift operations as indicated in the plant Administrative Procedures. The criteria of the Ziemann to Bixel letter dated March 15, 1977, have never been made part of the Big Rock Point Plant Operating License either by license amendment or Licensee commitment. Therefore, interpretation of the Technical Specifications to include those criteria is invalid and the item of noncompliance should be withdrawn.

The responses and commitments made by Consumers Power Company in our July 18, 1980, letter are still accurate and will be acted on as previously indicated.

David P Hoffman (Signed)

David P Hoffman
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector, Big Rock Point

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