



REGISTRATION
NO. 11
EXPIRES
12/31/77

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

March 5, 1976

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

DOCKET 50-155, LICENSE DPR-6
BIG ROCK POINT PLANT

This letter is written to respond to the item of apparent noncompliance identified in IE Inspection Report 050-155/76-01 transmitted by your letter dated February 13, 1976.

Your letter stated that corrective action with respect to Infraction 1 had been completed in a timely manner and that you had no further questions at this time. Additional response was requested with respect to Infraction 2. This infraction was:

- "2. Contrary to 10 CFR 50.59, safety evaluations were not conducted as required prior to performing construction activities relative to the following plant modifications involving safety-related equipment.
- a. The fire protection system sprinkler header was modified on October 24, 1975, without prior review and documented safety evaluation. (Paragraph 1.e, Report Details II)
 - b. Construction activity on December 19, 1975, concerning excavation between the turbine building and the containment building resulted in damage to the turbine building ventilation exhaust line while the reactor was operating. No review and documented safety evaluation was performed preceding this activity. (Paragraph 1.f, Report Details II)"


The occurrence associated with the fire protection sprinkler header was reported as AO-26-75 transmitted by letter dated November 24, 1975. We believe that the corrective action specified for this occurrence, which is the same as that specified in AO-24-75 is adequate corrective action.

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The occurrence associated with excavation between the turbine building and the containment building was reported as AO-30-75 transmitted by our letter

effort was being expended at the time when the occurrence took place. Based on the analysis of the cause of AO-30-75, two additional engineers at the plant have been assigned to review the extensive construction activities during the present outage on a continuing basis and perform the required safety evaluations per 10 CFR 50.59. We feel that our interim effort in reviewing all proposed facility changes and work packages associated with major facility changes as committed in response to AO-24-75 and expanded following AO-30-75 is adequate.

The four similar occurrences are of concern to Consumers Power Company. We note, however, there were very subtle differences in each of these occurrences and believe that we have developed at least interim procedures which will preclude their recurrence in the future. Further, work is being done in the General Office in an attempt to better define the problems and their permanent solutions such that less cumbersome permanent procedures may be implemented.


Ralph B. Sewell
Nuclear Licensing Administrator