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February 1, 1977

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

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

By letter dated January 7, 1977, Consumers Power Company was requested to respond to two infractions and one deficiency contained in IE Inspection Report No 050-155/76-22. The purpose of this letter is to provide the requested responses.

Infraction

"Contrary to 10 CFR 20.203(c)(3), the locked doors and gates used to control access to high radiation areas in the reactor facility are not established in such a way that no individual will be prevented from leaving a high radiation area."

Response

1. All high radiation areas have locks external to the doors and gates used to control access to those areas, negating the possibility of a malfunction of the lock if the lock was an integral part of the door or gate. Further, in the vast majority of entrances into high radiation areas, a Health Physics Technician is stationed at the entrance area for time keeping and pocket dosimeter rezero purposes, thus providing control of the entrance area. Infrequent entrances are made into high radiation areas during periods of plant shutdown by RWP-exempt personnel without a Health Physics Technician being stationed at the entrance. During those instances, the door or gate is left open and the lock is maintained external to the door. The radiation fields in these areas do not exceed 1,000 milliroentgen per hour during periods of plant shutdown. In the 15-year history of the Big Rock Point Plant, no one has ever been locked inside a high radiation area. Almost all high radiation areas have an entry room beyond the high radiation door. These areas are not high radiation areas since the dose rates are usually between 5 to 30 milliroentgen per hour.

2. To further reduce the possibility of inadvertently locking an individual inside a high radiation area, administrative controls requiring disabling the lock during entry will be implemented by February 15, 1977.

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Infraction

"Contrary to 10 CFR 20.201(b), measurement of particulate radioactivity in airborne effluents was not adequate to ensure compliance with 10 CFR 20.106 and Technical Specification 6.5.4(a), due to apparent bypass of the stack sample filter as noted for the week ending January 20, 1976."

Response

1. In Paragraph 9 of IE Inspection Report No 050-155/76-22, a comparison of radioactivity between the particulate filter and charcoal filter counted on January 20, 1976 is presented. A statement that, "...only about 4.4 E-04 microcuries (uCi) of cesium-137 was collected on the particulate filter..." is made. This statement appears to be the result of a misunderstanding of the procedure used for anlysis of the particulate filter. The particulate filter is a 7" x 7" square from which a 2" disc is cut and analyzed. The results are then multiplied by the ratio of the filter areas (11.3) to obtain radioactivity collected on the entire filter. The inspection report considered only the radioactivity presented on the 2" disc. Applying the conversion factor of 11.3 results in a total of 5.0 E-03 microcuries of cesium-137 collected on the particulate filter. This is approximately 4.2 times as much cesium-137 as collected on the charcoal filters, vice the 2.7 ratio stipulated in the report.

2. Corrective action was taken in February 1976 which consisted of training technicians in the proper technique utilized while installing the particulate filter to the particulate filter housing. Procedure RCP-5, Changing Stack Gas Filters, was revised and implemented to reflect this change. Further, during the month of January 1976 moisture problems in the stack gas sample system were experienced which have since been corrected.

Deficiency

"Contrary to Technical Specification 6.9.3.a(3), the semiannual report for the first half of 1976, dated August 31, 1976, and revised September 15, 1976, did not contain any of the required data regarding solid radwaste shipments made during the report period."

Response

The omitted date has been reported by letter of January 11, 1977 from R B Sewell to the Director of Nuclear Reactor Regulation. Omission of the data has been reviewed with those responsible to preclude recurrence.

Ralph B Sewell

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Nuclear Licensing Administrator