

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

REGION III

Report No. 50-155/81-05

Docket No. 50-155

License No. DPR-06

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

Facility Name: Big Rock Point Nuclear Plant

Inspection At: Charlevoix, MI

Inspection Conducted: April 10 through May 8, 1981

Inspectors: *D.C. Boyd*
G. C. Wright 5-27-81

for D.C. Boyd
M. E. Parker 5-27-81

for D.C. Boyd
Approved By: D. C. Boyd, Chief 5-27-81
Projects Section 1A

Inspection Summary

Inspection on April 10 through May 8, 1981 (Report No. 50-155/81-05)

Areas Inspected: Routine safety, resident inspector inspection involving: Operational Safety Verification, Surveillance Observation, General Employee Training, Requalification Training, Maintenance, and Independent Inspection. The inspection involved a total of 192 inspector-hours onsite by two NRC inspectors including 10 inspector-hours onsite during offshifts.

Results: Of the areas inspected, one item of noncompliance was identified, Inadequate Requalification Program (paragraph 5).

DETAILS

1. Persons Contacted

- *C. J. Hartman, Plant Superintendent
- *C. E. Axtell, Health Physicist
 - D. D. Herboldsheimer, Outage Coordinator
- *A. C. Sevener, Operations Supervisor
 - J. J. Popa, Maintenance Engineer
 - E. McNamara, Training Coordinator
 - V. A. Avery, Training Instructor
- *D. E. DeMoor, Technical Engineer
- *C. R. Abel, Operations and Maintenance Superintendent
- *T. Fisher, Quality Assurance
- *E. Raciborske, Quality Assurance Supervisor

The inspectors also contacted other licensee personnel, including shift supervisors, control room operators and document control, radiation protection and training personnel.

*Denotes those present at the exit interview.

2. Operational Safety Verification

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the month of April, 1981. The inspector verified the operability of selected emergency systems, reviewed tagout records and verified proper return to service of affected components. Tours of the reactor building and turbine building were conducted to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibrations and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector, by observation, verified that the physical security plan was being implemented in accordance with the station security plan.

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the month of April, 1981, the inspector walked down the accessible portions of the Core and Containment Spray systems to verify operability.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under technical specifications, 10 CFR, and administrative procedures.

No apparent items of noncompliance were identified.

3. Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the Reactor Protection System and the Core Spray System and verified that testing was performed in accordance with written procedures, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished, that test results conformed with technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

No apparent items of noncompliance were identified.

4. Training

The inspector reviewed Administrative Procedure, Personnel Training, Volume 1B, Chapter 13, the Master Training Plan, Volume 18, and corresponding training records.

The training program was reviewed to ascertain whether the overall training activities for new employees and the retraining of non-licensed personnel are in conformance with Technical Specification (T.S.) requirements. The inspectors verified that formal training and retraining programs have been established for new employees, temporary or service personnel, non-licensed/licensed personnel, technicians and craft personnel; that the formal training program for the personnel listed above covers General Plant Description, Job Related Procedures and Instructions, Radiological Health and Safety, Station Emergency Plans, Industrial Safety Program, Fire Protection Program, Security Program, On-the-Job Training and Quality Assurance Training; that the retraining program for technicians and craft personnel includes on-the-job training, formal technical training, and fire fighting training; that responsibilities have been assigned to assure that training program requirements have been met; and that all female employees are provided instructions concerning prenatal radiation exposure.

During the procedure review, the inspector noted a discrepancy in the Master Training Plan Volume 18. Administrative Procedure 1.13, Section 1.13-A.2.2 states that Radiation Protection retraining will be conducted annually, whereas Volume 18 makes reference to both annual and bi-annual retraining depending on which functional group the employee belongs to. This item was pointed out in Inspection Report 80-03. In addition, Regulatory Guide 8.27, dated March, 1981, states that radiation protection refresher training should occur annually, as a minimum. (81-05-01)

Regulatory Guide 8.13 states that female employees should be asked to sign a statement indicating they have received the information contained in Regulatory Guide 8.13 on prenatal radiation exposure, the licensee's procedure in this area does require this signature, but the licensee has not been adhering to this procedure for all female employees.
(81-05-02)

Volume 18, Chapter 1, Section 5.2.1. states that, "Initial training shall consist of a program covering those general headings and subtopics listed below." Included in the general heading is "Quality Assurance Indoctrination." In reviewing records of selected employee two individual folders were identified where QA indoctrination was not indicated as being received. The licensee pointed out that QA indoctrination is performed once a year for all new employees, for the previous one year period. This practice allows licensee personnel to work on and around plant safety related equipment for up to one year without a formal introduction to the Quality Assurance Program. This does not appear to an acceptable practice. (81-05-03)

Volume 18, Introduction, Section 4.0 states, "The entire manual shall be reviewed by the Plant Training Coordinator on a two-year basis as a minimum to assure its applicability to existing codes and changing needs." The inspector was unable to determine that the entire Master Training Manual had been reviewed by the training coordinator. (81-05-04)

The above examples, along with other isolated examples, which were brought to the licensee's attention, indicate that the general employee training requirements of Volume 18 are not being adhered to by the licensee.

No apparent items of noncompliance were identified.

5. Licensed Operator Regualification

The requalification program was reviewed to ascertain whether the licensed operator requalification training program is effective and in conformance with regulatory requirements. The inspector reviewed records to verify that an operator requalification training program is established and include preplanned lectures, attendance documentation and identification of specific training aids to be used in lieu of an instructor: the on-the-job training requirements have been specified to include control manipulations, discussion/review of changes in facility design, procedures, and license, and that records of licensed individuals are maintained to include completed course and yearly examinations, documentation of manipulations, documentation of required simulations of emergency and abnormal conditions, results of supervisory evaluations and observation of manipulations and simulations identified above, documentation of individual study, and documentation of accelerated requalification training.

The inspectors reviewed the records of licensed Senior Reactor Operators and licensed Reactor Operators to verify that the licensee's approved requalification training program was being properly implemented.

During the review of the requalification program, the inspector noted that the licensee, in a letter from Consumers Power Company to NRR,

dated August 6, 1980, stated that: "An overall grade of 80% on the annual requalification exam, with a minimum of 70% in any one category shall be required of all persons performing licensed duties. Persons receiving exam scores less than those stated above shall be enrolled in an accelerated training program within five days of their grade determination to upgrade their knowledge to an acceptable level (80% upon reexamination)." Volume 18, Chapter IV, Master Training Manual, Operations Department Section 5.6.25, states: "Each licensed individual shall be required to achieve an 80% overall passing grade and no less than 70% in any one category. A grade of less than 80% will require entry into an accelerated training program within five days of the grade determination. The individual shall be removed from his/her licensed activities until he/she satisfactorily passes a reexamination with 80% or greater." No mention of what action is to be taken if an individual achieves less than 70% in any category, as was committed to in the August 6, 1980, letter.

Further review of individual's scores on the September, 1980, Annual Requalification Exams identified two individuals, one reactor operator and one senior reactor operator who achieved an overall score of 80% but fell below 70% on individual categories. Neither individual was enrolled in an accelerated training program nor was either individual reexamined as per prior commitment. Discussion with onsite training personnel revealed that they were unaware of the August 6, 1980 commitments.

Facility Technical Specification 6.4.1 states:

"A retraining and replacement training program for the plant staff shall be maintained under the direction of the Plant Superintendent and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR, Part 55."

10 CFR 55, Appendix A, Section 4.e states that a requalification program shall have "provisions for each licensed operator and senior operator to participate in an accelerated requalification program where performance evaluation conducted pursuant to paragraphs 4a through 4d clearly indicate the need."

Contrary to the above, the licensee's existing requalification program appears to be deficient in identifying accelerated training for licensed personnel achieving less than 70% on a given section. Further, changes to the requalification program as outlined in Consumers Power Company's letter of August 6, 1980, which if implemented, would have brought the program into compliance with 10 CFR 55, were not made in a timely manner. (81-05-05)

It is to be noted that when the above situation was brought to the licensee's attention the two individuals were immediately enrolled in an accelerated training program on the sections in question.

The inspector's concern, pertaining to this item of noncompliance, is the reason for the information contained in the licensee's August 6, 1980, letter not reaching the appropriate licensee personnel to effect implementation. It is to this end that the licensee should direct their reply.

6. Maintenance

The inspector reviewed selected maintenance activities to ascertain that activities on safety related systems and components were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with Technical Specification requirements.

Although no apparent items of noncompliance were identified, the inspector has questions in the following areas and discussed the same with the licensee:

- a. The "Testing Requirement" section of the maintenance order is filled out only when testing is required. The inspector commented that if no testing is required, then this fact should be noted on the maintenance order, thus indicating that testing had been considered.
- b. Worker and management attention to detail. This is a general comment on recording data, placing calibration stickers and review of completed documentation by supervisors.
- c. The inspector questioned the advisability of writing maintenance orders to "inspect, trouble shoot and repair" equipment. The potential equipment control problems and Quality Control problems were discussed.
- d. The inspector could not identify any mechanism for controlling changes to maintenance orders after a portion of the review chain had been completed.

7. Independent Inspection

The inspectors discussed with the licensee the definitions of "Restricted" and "Unrestricted" areas and the practice of designating areas, outside the protected area fence, as "Restricted Areas."

The inspectors indicated that due to the training requirements of 10 CFR 19.12, pertaining to restricted areas, the licensee's definition of a "Restricted Area" in Volume 11, "Radiation Protection Manual - General" is not a viable definition.

The inspectors also stated that the practice of using an approximately three and a half foot high strand wire fence around the radioactive waste storage facility (located outside the protected area fence) and around a

section of the protected area fence adjacent to the contaminated tool storage warehouse, in the southwest corner of the protected area, to define a "restricted" area was unacceptable.

The licensee, in response to the above positions, has committed to the following actions:

- a. Redefine, in Volume 11, the term "Restricted Area". On an interim basis, the "Restricted Area" will be defined as all areas inside the protected area fence and the area around the radioactive waste storage facility defined by stranded wire the existing stranded wire fencing and adequate posting.

The above definition is temporary, for further details refer to item c. below. (81-05-06)

- b. The licensee will reduce the radiation levels at the exterior of the contaminated tool storage warehouse, located in the southwest corner of the protected area, such that the area outside the protected area fence will meet the definitions of an unrestricted area. (81-0507)

- c. Pertaining to the wire fence around the radioactive waste storage area, the licensee has stated that plans are underway to enclose the facility with a permanent building. A completion date of October 1, 1981, has been set for the building.

The licensee and the inspectors have agreed that the wire fence, along with appropriate posting, will be acceptable to define the restricted area, pending completion of the permanent building, based on a completion date of October 1, 1981. (81-05-08)

The licensee has been informed that if the proposed building is not completed, or if delays are encountered, other measures will have to be implemented to insure compliance with 10 CFR 20 requirements on radiation levels and access controls in regard to restricted and unrestricted areas.

8. Exit Interview

The inspectors met with the individuals denoted in paragraph 1 at the conclusion of the inspection and summarized the scope and findings of the inspection. The licensee acknowledged the inspector's comments.