



Consumers
Power
Company

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July 7, 1981

Director, Nuclear Reactor Regulation
Att Mr Dennis M Crutchfield, Chief
Operating Reactors Branch No 5
US Nuclear Regulatory Commission
Washington, DC 20555



DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT
PLANT - CORRECTION TO RESPONSE TO POST-TMI
REQUIREMENTS FOR THE EMERGENCY OPERATIONS
FACILITY (GENERIC LETTER 81-10)

Consumers Power Company letters dated June 22, 1981 and July 3, 1981 (by reference) provided our position with respect to NUREG-0654 shift manning criteria in response to NRC Generic Letter 81-10 dated February 18, 1981. This position also pertained to our responses to NUREG-0737, Item I.A.1.3 - Shift Manning.

It has been determined that our position concerning the Notification/Communications responsibility should be changed to be consistent with the Big Rock Point Plant Site Emergency Plan. The Site Emergency Plan assigns the responsibility of Notification/Communications to the Site Emergency Director. The Site Emergency Director would typically be expected to be the Shift Supervisor (SS) during emergency situations until the Plant Superintendent or his designate arrives to fulfill that role. Therefore, the SS will either perform the notification/communications required at the onset of an emergency situation or assign one of the normal shift complement who is considered by the SS to be available to perform these duties. Upon arrival of the long-term Site Emergency Director (the Plant Superintendent or his designate), the SS will be relieved of the Notification/Communications responsibility. Ultimately, the Plant Technical Engineer will perform these responsibilities.

Therefore, the Big Rock Point Plant minimum on-shift description (table) provided by our June 22, 1981 letter should be revised to the following:

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1 Shift Supervisor (SRO) - Notification/Communications*
 2 Control Room Operators (RO)
 2 Auxiliary Operators (AO)
 1 Shift Technical Advisor**
1 HP - Rad/Chem Technician***
 7 MINIMUM TOTAL

Clarification Notes:

- * The Shift Supervisor may perform or delegate his Notification/Communications responsibility as he deems necessary. The long-term Site Emergency Director (Plant Superintendent or his designate) will assume this responsibility until the arrival of the Plant Technical Engineer.
- ** The inclusion of a Shift Technical Advisor among the on-shift complement of 7 people is provisional. The decision to maintain this position will be made upon completion of an assessment of emergency situation staffing levels.
- *** Presently, an on-shift HP Technician is not provided. Current practice involves "call-up" of required personnel who can augment the on-shift staff within 60 minutes. Consumers Power intends to provide an on-shift HP Rad/Chem Technician by November 1, 1982. The basis for providing only one technician is that the health physics and chemistry technician functions have been traditionally combined and this is reflected in our Site Emergency Plan Implementing Procedures. It should be noted that the actions required of this technician for emergency situations are quite limited in the first few hours of Emergency Plan Implementation.

The information provided herein should be considered as part of our Deferral Request No 7 (Improving Licensee Emergency Preparedness - Long Term (NUREG-0654/FEMA-REP-1)) provided by our submittal dated March 31, 1981



David P Hoffman
 Nuclear Licensing Administrator

CC Director, Region III, USNRC
 NRC Resident Inspector-Big Rock Point Plant