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June 29, 1981

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

DOCKET 50-155 - LICENSE DPR-6 - BIG  
ROCK POINT PLANT - RESPONSE TO  
IE INSPECTION REPORT NO 81-05

IE Inspection Report No 50-155/81-05 dated May 27, 1981, identified one apparent item of noncompliance found at the Big Rock Point Plant. Our response to this violation (Appendix A, dated June 1, 1981) is as follows:

Violation:

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 is deficient in identifying accelerated training for licensed personnel failing to achieve a passing score on an individual section of the annual requalification exam.

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#### Response to Violation

Changes in the licensed operator requalification program as outlined in Consumers Power Company's letter of August 6, 1980 were not implemented. Specifically, two individuals who had not attained a minimum grade of 70% in some specific instruction sections and had not been enrolled in an accelerated training program on those sections within five days of grade determination as required by the submitted program. A review of the cause of this incident has not identified the reason for the lack of information transmittal to the Training Department-On-site. Information pertaining to commitment implementation is provided later in this submittal.

#### Corrective Action Taken and Results Achieved

The two individuals not completing the licensed operator requalification training as required by the commitment in our letter dated August 6, 1980 were provided with special training sessions immediately upon identification of this violation by the inspector. Subsequent examination of those individuals resulted in acceptable test scores in those affected sections of the requalification training program.

#### Corrective Action to Prevent Recurrence

The Big Rock Point Plant Manual Volume 18 - Master Training Plan has been revised to include requirements for special training and retesting as outlined in our letter dated August 6, 1980.

#### Date When Full Compliance Will be Achieved

Full compliance has been achieved for the specific incident that resulted in this violation. Special training for the two licensed personnel was completed on May 11, 1981 and a Master Training Plan revision was issued for implementation on May 26, 1981.

#### Generic Information Pertaining to Implementation of Commitments

Consumers Power Company currently uses several methods to implement and verify implementation of commitments. These methods include the following:

- General Licensing Information Distribution - Incoming and outgoing correspondence between Consumers Power Company and the NRC is distributed to all department Directors, Plant Managers/Superintendents and a cognizant/responsible individual of the Nuclear Operations Department. It is the responsibility of the "responsible" individual to take action to enact commitments in their responsibility area. The Nuclear Licensing Department provides this distribution and for significant Consumers Power Company commitments includes a cover sheet indicating Licensing's interpretation of those commitments and identifying the "responsible" individual.

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- Big Rock Point Plant Licensing Information Distribution - Incoming and outgoing correspondence between Consumers Power Company and the NRC is distributed internally upon receipt at the plant. Distribution to the Plant Review Committee (PRC) via a PRC review routing form, to the Operations Department for Senior Licensed Operator review and to the Training Department-On-site provides notification to personnel responsible for implementation of commitments.
- Plant Quality Assurance Verification - The plant Quality Assurance Department performs random verifications of commitment implementation completion to ascertain the effectiveness of the above methods.

Consumers Power Company recognizes the necessity and complexity of assuring commitment implementation. Therefore, continuing efforts are being made to develop new systems and methods to accomplish our goal of assuring that all commitments are fully implemented and adhered to. Examples of systems under development and/or investigation are a computerized Licensing Correspondence Logging System and computerized procedure control systems.

*Gregory C. Withrow*

Gregory C Withrow  
Senior Licensing Engineer

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

CONSUMERS POWER COMPANY  
Big Rock Point Plant

IE Inspection Report No 50-155/81-05  
Response to NRC letter dated June 1, 1981

Docket No 50-155  
License No DPR-6


At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits our response to NRC letter dated June 1, 1981 which provides IE Inspection Report No 50-155/81-05 and a Notice of Violation dated June 1, 1981. Consumers Power Company's response is dated June 29, 1981.

CONSUMERS POWER COMPANY

By 

J W Reynolds, Executive Vice President  
Energy Supply

Sworn and subscribed to before me this 29th day of June 1981.

  
Helen I Dempski, Notary Public  
Jackson County, Michigan

My commission expires December 14, 1983

(SEAL)