



Consumers
Power
Company

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

September 27, 1974

Mr. James G. Keppler, Regional Director
Region III
Directorate of Regulatory Operations
US Atomic Energy Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: Docket 50-155
License DPR-6
Big Rock Point Plant

Dear Mr. Keppler:

This letter is written in response to the citation contained in RO Inspection Report 50-155/74-05. This citation involved an alleged violation of 10 CFR 20.401, which requires a running total of an individual's occupational exposure be maintained on the basis of calendar quarters. The citation stated, "Contrary to the above, a running total of occupational exposure is not being maintained as required for those individuals permanently assigned to the Big Rock Point facility with temporary assignments to the Palisades facility."

Consumers Power Company maintains a composite exposure history record at our office in Jackson, Michigan. This exposure history record includes exposures for individuals that have received exposures at both Palisades and Big Rock Point Plants. This exposure history record is updated on a monthly basis by the film badge vendor. Therefore, running quarterly exposures were kept on one film badge report which meets the standards of substituting for a Form AEC-5 as an official record. However, since the Palisades Plant and the Big Rock Point Plant separately badge personnel, the exposures listed in the reports maintained at each facility involved only those exposures an individual received at that facility.

Consumers Power Company believes the central record maintained in the General Office fulfills the letter of 10 CFR 20.401(a). However, on review of this citation, we have concluded that a better course of action would be to maintain complete totals for individuals at both facilities regardless of the source of the exposure.

The following immediate actions have been taken to improve the records maintained at the plants. Each plant Radiation Protection Supervisor was sent a memorandum directing that the exposure history be corrected for specified personnel. Also, they have been instructed to no longer rebadge Company personnel on assignment to their plant if they previously had been issued a badge at another Company plant.

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The film badge vendor has also been sent a letter directing the necessary corrections to his exposure records.

To further ensure that composite exposure records are maintained at each plant on a routine basis, the following actions are being taken:

1. The film badge vendor has been notified to stop supplying separate facility reports. He will be directed to supply one (1) original and three (3) copies of the monthly composite exposure record for all personnel.

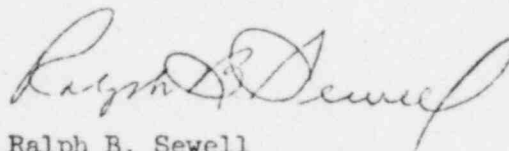
2. A copy of the composite monthly exposure record shall be forwarded to each plant's Radiation Protection Supervisor to be maintained as his permanent exposure file.

3. To assure no duplicate exposures occur, the plants will no longer rebadge or double badge personnel who are on temporary transfer.

4. The film badge vendor will be instructed to key his records on social security numbers of personnel rather than last name and initials or vendor IBM number notations.

These steps will be implemented by January 1, 1975.

Yours very truly,



Ralph B. Sewell
Nuclear Licensing Administrator

RBS/ds

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