

David J VandeWalle Nuclear Licensing Administrator

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February 26, 1982

James G Keppler, Administrator 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 50-155/81-17, "EMERGENCY PREPAREDNESS APPRAISAL", DATED JANUARY 28, 1982

NRC Confirmation of Action Letter dated December 44 1982 Identified agreements reached between Consumers Power Company and NRC staff representatives as a result of an Emergency Preparedness Appraisal conducted at the Big Rock Point Plant. NRC IE Inspection Report 81-17 entitled "Emergency Preparedness Appraisal" dated January 28, 1982 included the agreements specified by the Confirmation of Action Letter and incorporated those items as Appendix A (Significant Appraisal Deficiencies). In addition the Inspection Report included Appendix B (Preparedness Improvement Items) and Appendix C (Emergency Preparedness Evaluation Report).

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It is the intent of this letter to provide Consumers Power Company's response to Appendices A and B. The responses describe Consumers Power Company's planned actions for those items identified in Appendices A and B and provides a schedule for the completion of the commitments associated with those items.

David J-VandeWalle Nuclear Licensing Administrator

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

Attachments

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CONSUMERS POWER COMPANY Big Rock Point Plant

IE Inspection Report No 50-155/81-17 Response to NRC letter dated January 28, 1982

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 January 28, 1982 which provides IE Inspection Report No 50-155/81-17 entitled "Emergency Preparedness Appraisal". Consumers Power Company's response is dated February 26, 1982.

CONSUMERS POWER COMPANY

2/26 By WUU R B DeWitt, Vice President

Nuclear Operations

Sworn and subscribed to me this 26th day of February, 1982.

Helen I Dempski, Notary Public Jackson County, Michigan My commission expires December 14, 1983

RESPONSES TO APPENDIX A

A. Item 1 Emergency Implementation Procedures

Emergency Operating and Off Normal Procedures shall contain statements directing the Reactor Operator to inform the Shift Supervisor of a possible Emergency Plan Condition requiring possible classification of an event. These statements shall be conspicuous. (Section 5.2) This shall be completed by February 15, 1982.

Response:

Emergency Operating Procedure and Off Normal Procedure were revised to include statements directing the Reactor Operator to inform the Shift Supervisor of a possible classification of an event. These procedures were reviewed by the Plant Review Committee (PRC) and were in effect before the February 15, 1982 date.

- B. Item 2 Meteorology
 - a. A backup meteorological system will be installed, consisting of a wind direction and wind speed sensors mounted on the stack at the level of the isokinetic probe, and readout in the control room. This will be completed by May 15, 1982, contingent on procurement.
 - b. A description of the above system will be submitted for NRC review by February 1, 1982. (Section 4.2.1.4)

Response:

Consumers Power letter dated January 29, 1982 to James G. Keppler, Region III, contained a description of the backup meteorological system for NRC review. This letter met the due date of February 1, 1982. Installation of the system is expected to be completed by May 15, 1982 contingent on procurement.

C. Item 3 Emergency Action Levels

EPIP-1 will be reviewed and revised so that accident classifications are based on reliable and observable indications available to the control room operator. This will be completed by March 1, 1982. (Section 3.2.2)

Response:

The accident sequences developed in the Big Rock Point Probabilistic Risk Assessment were used to classify various transients according to the four emergency classifications found in NUREG 0654. This systematic approach yeilded specific indications which correspond to the emergency classifications. FPIP-1 has been reviewed and is currently under revision to incorporate specific action levels. These procedures will be approved by PRC before March 1, 1982.

D. Item 4 Training

Personnel acting as Site Emergency Directors and Shift Technical Advisors will be trained in the revised emergency plan implementing procedures with emphasis on the classification of accidents in accordance with EPIP-1. This will be completed by May 1, 1982. (Section 3.2.2)

Response:

Training for personnel acting as Site Emergency Director and Shift Technical Advisors in the revised Emergency Plan Implementing Procedures with emphasis on the classification of accident in accordance with EPIP-1 will commence after PRC approval of the revised procedures and training will be completed by May 1, 1982.

E. Item 5 Backup Analytical Capability

An offsite laboratory facility at the EOF in Boyne City will be established by May 1, 1982. (Section 5.4.2.1)

Response:

Appropriate equipment has been procured and is on site for calibration and checkout. A radiological monitoring system will be established at the EOF in Boyne City by May 1, 1982.

F. Item 6 Survey Procedures

Those procedures necessary to perform plant environs and offsite radiological monitoring will be consolidated into one procedure for use by monitoring teams by March 1, 1982. (Section 5.4.2.1)

Response:

Procedures necessary to perform plant environs and off-site radiological monitoring have been consolidated into one section of the Site Emergency Plant Implementing Procedures for use by monitoring teams.

The procedure is currently undergoing rev aw and will be approved by March 1, 1982.

APPENDIX B PREPARDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Big Rock Point Nuclear Plant Emergency Preparedness Program conducted November 30 - December 10, 1981 the following items should be considered for improvement:

 The Emergency Planning Coordinator should attend at least one training course per year to update his knowledge and expertise. (Sections 1.0, 1.1, 1.2, 1.3, 1.4)

Response:

During the fall of 1981, the Emergency Planning Coordinator (EPC) received specialized training in emergency planning from a contractor at the plant site.

The EPC will receive formal training in emergency planning at least once per year commencing in 1982, to update his knowledge and expertise.

2. Establish written action levels for evacuation for all Site Area and General Emergency conditions as per NUREG-0654. (Section 5.4.3.2)

Response:

Emergency procedure EPIP-6B contains specific guidelines for possible evacuation (100 mr/hr whole body dose and 4 x 10⁻⁸ μ Ci/cc radioiodine concentration). It is the responsibility of the Site Emergency Director to determine when and which personnel to evacuate based on the above guidelines. It is our position that these are adequate evacuation action levels. No further action will be taken.

3. Clearly mark and/or identify site evacuation routes, primary and secondary, inside and outside the facility. (Section 5.4.3.2)

Response

Big Rock Point is a small plant (127 on-site personnel) and as such does not have a complicated hallway system. The routes to the assembly areas and the egress routes for evacuation are quite obvious. We have never encountered a problem during assembly and evacuation drills with either site or visitor personnel. Based on the size of the Plant and the simplicity of the layout, no further action will be taken.

 Prepare a concise oral announcement for evacuation of ownercontrolled area. (Section 5.4.3.2)

Response

Big Rock Point does not use the public address system to announce evacuation of the Plant site. All non-essential plant personnel assemble in one of two areas and telephone calls are placed to the assembly area leaders of the two areas while the remaining area (Technical Support Center/Control Room) uses face-to-face communication. Previously held evacuation drills have proven this system to be effective and timely. It is our position that no further actions need be taken.

5. Each emergency kit should contain an inventory list and inspection documentation. (Section 4.2.1.1)

RESPONSE:

The above report states, "The kits in the Charlevoix County EOC, while found acceptable, had no documentation of inspection and inventory."

Prior to 1980 the inspection and inventory form was maintained in each emergency kit and the form was replaced on an annual basis. In 1981, this "annual form" was replaced with a one time use inspection and inventory form which was returned to the Plant Health Physicist for review and filing. Thus, inspection and inventory forms have not been maintained in the emergency kits since early 1981.

Review of these forms maintained by the Plant Health Physicist clearly indicate that the emergency kit in the Charlevoix County EOC has been inspected on a normal routine basis.

In order to alleviate the problem of numerous separate inventory and inspection forms, all forms were combined into one procedure in November 1981, and expanded to include the first aid kits. This surveillance procedure (RP-36) was placed in Volume 12, <u>Radiation Protection -</u> <u>Departmental</u> and the "Surveillance Test Board" was updated to reflect the new addition.

This method will alleviate the burdensome problem of maintaining proper documentation of emergency kit inspection. Therefore, each kit will not contain an inventory list and inspection documentation. Such documentation, after appropriate review will be filed in Document Control.

6. Formalize all procedures to include use of privately-owned vehicles and county vehicles during an emergency. (Section 4.2.6)

Response

Emergency Procedure EPIP-4AA is currently being revised requiring Chemical and Radiation Protection Technicians to use their personal vehicles in the performance of emergency duties. Futhermore, Consumers Power never intended to use county owned vehicles in the performance of these duties. Consumers Power does have an agreement with Charlevoix County to have snow plowed from the access road under severe weather conditions. No further actions will be taken.

- 1:

 Establish a procedure to control vehicle keys and availability. (Section 4.2.6)

Response

Control of vehicle and other plant keys is currently the responsibility of the Shift Supervisor. The keys are kept in a locked cabinet in the Shift Supervisor's office. Plant personnel who wish to obtain a key make a request to the Shift Supervisor. He then determines if a need exists for that individual to receive the requested key. He then must log the key out and back should he decide to issue it. These controls are deemed adequate. No further actions will be taken.

 Provide visible alarms in all high noise areas for emergency evacuation. (Section 5.4.3.2)

Response

The Big Rock Point Plant uses a siren to notify personnel to assemble during an emergency. Notification to evacuate from the assembly areas is done by telephone or as face-to-face communication (see Appendix B Item 4). The siren can be heard in any location in the Plant and there are no high noise levels in the assembly areas. Communication problems have never been encountered during site assembly and evacuation drill. Based on the above Consumers Power relieves visible alarms are unnecessary. No further actions will be taken.

 All support agencies that may be requested to provide on-site assistance should be made aware of how personal dosimeters will be issued. (Sections 3.1.3.2, 6.0 and 6.1)

Response:

IEIR 81-17 states; "Access of volunteers reporting directly to the plant site is expedited by photo ID's provided to the firemen by the Plant. The department; however, was not cognizant of the Plant's current provisions for the prompt issuing of personal dosimeters to firemen when responding to a cal. from the Plant. The Plant should inform Charlevoix City Officials and the Charlevoix Fire Department of these provisions."

The Charlevoix Fire Department personnel will be informed of the above provisions during the annual training/retraining program. Charlevoix City Officials will not be informed of these provisions since plant access during emergencies is limited to essential personnel.

 The licensee should ensure the compatibility of their equipment with equipment from all support fire departments. (Sections 3.1.3.2, 6.0 and 6.1)

Response:

Fire fighting equipment including hoses and hydrants at Big Rock Point conform to the applicable codes and standards of the National Fire Protection Association. IEIR 81-17 states, "This group indicated firsthand knowledge of the compatibility of their equipment, for example, hoses and connections, with those of the Plant".

Fire Department Personnel will be given a plant tour during the annual training/retraining period to assess the compatibility of their equipment with Plant equipment.

 The Charlevoix Township Fire Department should be provided with a copy of the Big Rock Point Emergency Plan, and Big Rock Point should provide annual site tours for these firefighters. (Sections 3.1.3.2, 6.0 and 6.1)

Response:

The Charlevoix Township Fire Department will be provided a copy of the Big Rock Point Emergency Plan and placed on the distribution list for future revisions. This will be accomplished by April 15, 1982.

A plant tour will be offered on an annual basis.

12. Hospital procedures, in support of the Big Rock Point Emergency Plan, should be specific to each facility. (Sections 3.1.3.2, 6.0 and 6.1)

Response:

IEIR 81-17 states; "They did suggest that the plants combined procedure for this activity be prepared as two separate documents, one for this hospital (The Little Traverse Division (Petoskey) of the Northern Michigan Hospitals) and the other for the Charlevoix Area Hospital. This would facilitate inclusion of hospital specific information; eg, for contact personnel and their telephone numbers, in each procedure."

It has been Consumers Power Company philosophy that telephone numbers should not appear in individual procedures since a change in one telephone number, discovered during the quarterly telephone number verification procedure, may require the review of several procedures in order to assure a complete update of the necessary procedures. Instead, all telephone numbers that maybe sed in any of the four catagories of accidents as defined in the Site Emergency Plan are listed in Volume 9A, Site Emergency Plan Implementing Procedures, EPIP-2. This requires the communicator to use one section of the Site Emergency Plan Implementing Procedures for all telephone notifications that might be required.

It appears that the Emergency Room Staff at the hospitals are not aware of our procedures, which is understandable since they do not have a copy of Volume 9A, but they do have a copy of 6E, First Aid and Medical Care from Volume 9A.

It is the responsibility of Consumers Power Company and not the area hospital staffs to update the telephone contact list.

13. Big Rock Point should ensure that the US Coast Guard is familiar with the Big Rock Point Emergency Plan, the Implementing Procedures and what actions Big Rock Point expects the US Coast Guard to take. (Sections 3.1.3.2, 6.0 and 6.1)

Response:

A meeting and training program has been scheduled for the Station Chief and Disaster Committee of the US Coast Guard Station at Charlevoix. This program will begin February 26, 1982 and is scheduled for completion by March 1, 1982 and will include; 1. Familiarization with the Big Rock Point Plant Site Emergency Plans and Implementing Procedures, 2. USCG role with state and government interface, 3. additional emergency needs.

 Procedures for prompt sample preparation, packaging, and transport to the Midland and Palisades plants for assaying should be prepared - if setting up the facility at the EOF is unduly delayed.

Response:

Most of these procedures are currently in rough draft. All will be reviewed and implemented by April 15, 1982.