



Consumers
Power

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May 18, 1990

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
LICENSEE EVENT REPORT 90-002 - TECHNICAL SPECIFICATION VIOLATION -
UNQUALIFIED TECHNICIAN ASSIGNED TO SHIFT COMPLEMENT

Licensee Event Report (LER) 90-002 (Technical Specification Violation -
Unqualified Technician Assigned to Shift Complement) is attached. This event
is reportable to the NRC per 10CFR50.73(a)(2)(i).

J. Daniel Eddy

J Daniel Eddy
Plant Licensing Engineer

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

Attachment

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Big Rock Point Plant										DOCKET NUMBER (2) 0 5 0 0 0 1 5 5 1 OF 0 1 3									
TITLE (4) TECHNICAL SPECIFICATION VIOLATION - UNQUALIFIED TECHNICIAN ASSIGNED TO SHIFT COMPLEMENT																			
EVENT DATE (5)				LER NUMBER (6)				REPORT DATE (7)				OTHER FACILITIES INVOLVED (8)							
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME				DOCKET NUMBER (8)						
0 4	2 0	9 0	9 0	0 0 2	0 0	0 5	1 8	9 0	N/A				0 5 0 0 0						
OPERATING MODE (9) N				THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)															
POWER LEVEL (10) 0 9 1				20.402(b)				20.405(e)				00.734(2)(iv)				73.71(b)			
				20.405(a)(1)(i)				00.20(a)(1)				00.734(2)(iv)				73.71(a)			
				20.405(a)(1)(ii)				00.20(a)(2)				00.734(2)(iv)				OTHER (Specify in Abstract below and in Text, NRC Form 205A)			
				20.405(a)(1)(iii)				00.734(2)(i)				00.734(2)(iv)(A)							
				20.405(a)(1)(iv)				00.734(2)(ii)				00.734(2)(iv)(B)							
				20.405(a)(1)(v)				00.734(2)(iii)				00.734(2)(v)							
LICENSEE CONTACT FOR THIS LER (12)																			
NAME RJ Alexander, Technical Engineer										TELEPHONE NUMBER 611 6 514 71-1615 317									
COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)																			
CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NRC		CAUSE	SYSTEM	COMPONENT	MANUFAC- TURER	REPORTABLE TO NRC									
SUPPLEMENTAL REPORT EXPECTED (14)										EXPECTED SUBMISSION DATE (15)									
YES (If yes, complete EXPECTED SUBMISSION DATE)										X NO									

ABSTRACT (Limit to 1400 spaces, i.e. approximately fifteen single-space typewritten lines) (16)

Big Rock Point Technical Specification 6.2.2.d requires that an individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. Contrary to this requirement, on April 20, 1990, it was discovered that a radiation protection technician assigned to the shift complement did not have two of the on-the-job (OJT) training sign-offs completed. The individual was assigned to shift during a period of several months during 1989.

At the time of discovery, the individual was not assigned to the shift complement and prior to re-assignment, the two remaining OJT sign-offs will be completed. To prevent recurrence, the OJT procedure will be revised to separate the sign-offs for shift coverage qualification from the remaining tasks to permit easier identification of qualified technicians.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104

EXPIRES 6/21/85

FACILITY NAME (1) Big Rock Point Plant	DOCKET NUMBER (2) 0 5 0 0 0 1 5 5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 0	0 0 2	0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Discussion of Event

Big Rock Point Technical Specification 6.2.2.d requires that an individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. Big Rock Point Administrative Procedure 5.0 states, "An individual qualified in Radiation Protection procedures must be able to perform those activities outlined in an NRC letter dated March 15, 1977 from Dennis L. Ziemann to David A. Bixel and qualified to perform those tasks identified for backshift coverage in Administrative Procedure 1.7.1."

During performance of a Quality Assurance Audit on April 20, 1990, it was discovered that one radiation protection technician did not have two tasks, identified for backshift coverage, signed off on his most recent "OJT" qualification card. Further review showed that the individual was assigned backshift coverage alone for a period of several months in 1989. This was determined to be a violation of plant administrative requirements which resulted in a failure to meet Technical Specification 6.2.2.d shift manning requirements.

Cause

The cause of the event was determined to be a personnel error on the part of the Chemistry and Radiation Protection Supervisor who failed to recognize that two sign-offs were still needed prior to assigning the technician to backshift coverage. Contributing to the error is the fact that the existing OJT qualification system is cumbersome to manage and improvements are warranted.

Corrective Actions Taken

None. The individual involved was a "contract technician" hired on a temporary basis in 1989 to support coverage while Consumers Power technicians were in training or on vacation. The individual was no longer providing shift coverage at the time of discovery. Although the individual was recently rehired to support refueling outage preparations, no plans exist for returning the individual to shift coverage. Should the need arise to again assign the individual to backshift, a review will be conducted to insure all sign-offs are current and complete.

Corrective Action To Prevent Recurrence

The following actions will be completed by August 1, 1990 to insure that technicians with backshift assignments meet the Administrative Procedure requirements.

1. A review of the qualification files for all backshift technicians will be performed to insure they meet the OJT requirements. Any deficiencies identified will be promptly corrected.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Big Rock Point Plant	DOCKET NUMBER (2) 0 5 0 0 0 1 5 5	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (If more space is required, use additional NRC Form 305A's) (17)

2. The "OJT" qualification procedure will be revised to segregate all required tasks for backshift assignment from the other "OJT" sign-offs. This will minimize the potential for supervisor error in reviewing technician qualifications prior to backshift assignment.

Safety Significance

The requirement to have a person qualified in radiation protection procedures onsite was added to the BRP Technical Specifications in 1984. With that requirement, plant administrative procedures were developed to establish technician qualification requirements in accordance with the NRC letter from D. L. Ziemann dated March 15, 1977. To our knowledge, most other nuclear plants utilize ANSI 18.1 or 3.1 criteria to establish technician qualification to satisfy Technical Specification requirements.

The contract technician obtained in 1989 to support the BRP staff was deficient in the two sign-offs required by BRP Administrative Procedures, however, the technician was qualified by both ANSI 18.1 and 3.1 with thirteen years experience in radiation protection. Through this experience and training, the individual was capable of performing the missing tasks (perform source and background check on the gross gamma and proportional counters) and support backshift activities, even though the sign-offs were missed.