

DMB

July 8, 1982

Docket No. 50-155

Consumers Power Company  
ATTN: Mr. R. B. DeWitt  
Vice President  
Nuclear Operations  
212 West Michigan Avenue  
Jackson, MI 49201

Gentlemen:

This refers to the management meeting held by me and other NRC representatives with Mr. J. D. Selby and other representatives of the Consumers Power Company on April 14, 1982, to review the results of the NRC's assessment of the utility's regulatory performance at the Big Rock Point Nuclear Plant in connection with NRC Manual Chapter 0516 - Systematic Assessment of Licensee Performance (SALP) covering the period July 1, 1980 to June 30, 1981.

A preliminary copy of the SALP Report was provided for your review in advance of our meeting. The final SALP Report including the SALP Board Chairman's letter to you is enclosed.

In addition to the assessments and recommendations made by the SALP Board contained in the enclosed SALP Report, I wish to give you my overall observations and assessment relative to the utility's regulatory performance during the assessment period:

1. With respect to the SALP ratings, the Regional SALP Board views the Category 2 rating as the rating which it anticipates most licensees will achieve. Category 1 rating is given only for superior performance and there is reasonable expectation that it will continue. A Category 3 rating is given when the licensee's performance is considered minimally acceptable and identified weaknesses warranted special licensee management and NRC attention.

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- 2. The overall regulatory performance at the Big Rock Point Power Plant continued at a satisfactory level during the assessment period. The licensee was responsive to most regulatory concerns as indicated by the improvements in Radiological Controls and the positive steps taken to improve the training program. Compliance with regulatory requirements has been exceptional as indicated by the minor nature of its noncompliance history.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the SALP Report, and your March 17, 1982, letter will be placed in the NRC's Public Document Room.

No reply to this letter is required; however, should you have any questions concerning these matters, we will be pleased to discuss them with you.

Sincerely,

**Original signed by**  
**A. Bert Davis**

James G. Keppler  
Regional Administrator

Enclosure:

- 2. Inspection Report  
No. 50-155/82-10

cc w/encl:

- D. J. Vandewalle, Nuclear Licensing Administrator
- C. J. Hartman, Plant Superintendent
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- Ronald Callen, Michigan Public Service Commission

RIII ✓  
Tambling/so  
7/2/82  
6

RIII ✓  
Spessard

RIII ✓  
Norelius  
7/6/82

RIII ✓  
Hind  
7/7/82

RIII ✓  
Davis  
7/7/82

RIII ✓  
Keppler  
7/8/82

PRELIMINARY

SALP RIII

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Systematic Assessment of Licensee Performance

Consumers Power Company

Big Rock Point Nuclear Plant  
Docket No. 50-155  
Report No. 50-155/82-10

Assessment Period  
July 1, 1980 to June 30, 1981

March 1982

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Consumers Power Company  
ATTN: Mr. R. B. DeWitt  
Vice President  
Nuclear Operations  
212 West Michigan Avenue  
Jackson, MI 49201

Gentlemen:

This is to confirm the conversation between Mr. D. J. Vande Walle and Mr. D. C. Boyd of the Region III staff scheduling April 14, 1982 at 10:30 to 12:00 a.m. as the date and time to discuss the Systematic Assessment of Licensee Performance (SALP) for the Big Rock Point Plant. This meeting is to be held at the Sheraton Hotel, One Jackson Square, in Jackson, Michigan.

Mr. James G. Keppler, the Regional Administrator, and members of the NRC staff will present the observations and findings of the SALP Board. Since this meeting is intended to be a forum for the mutual understanding of the issues and findings, you are encouraged to have appropriate representation at the meeting. As a minimum we would suggest Mr. J. D. Selby, President, Mr. R. J. Reynolds, Executive Vice President, or Mr. C. J. Hartman, Plant Superintendent and managers for the various functional areas where problems have been identified.

The enclosed SALP Report which documents the findings of the SALP Board is for your review prior to the meeting. Subsequent to the meeting the SALP Report will be issued by the Regional Administrator.

Enclosure 1 to this letter summarizes the more significant findings identified in the SALP Board's evaluation of the Big Rock Point Plant for the period of July 1, 1980 to June 30, 1981.

If you desire to make comments concerning our evaluation of your facility, they should be submitted to this office within twenty days of the meeting date; otherwise, it will be assumed that you have no comments.

In accordance with Section 2.790 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the SALP Report, and your response and commitments (or your comments, if any) will be placed in the NRC's Public Document Room when the SALP Report is issued.

The response (or comments) requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-5111.

Consumers Power Company

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If you have any questions concerning the SALP Report for the Big Rock Point Plant we will be happy to discuss them with you.

Sincerely,

J. A. Hind, Director  
Division of Emergency Preparedness  
and Operational Support

Enclosures:

1. Significant Findings
2. Big Rock Point SALP Report  
(5 copies)

cc w/encls:

Resident Inspector, RIII

## Enclosure 1

Significant SALP Report findings for the Big Rock Point Plant.

### General Observations

During the July 1, 1980 to June 30, 1981, evaluation period the overall performance has remained very satisfactory with no programmatic problems being identified in any of the functional areas examined.

One area which management is encouraged to give additional attention is the area of personnel training. While the performance in this area is acceptable, the size of the training staff does not appear large enough to provide for the timely implementation of the training program for both licensed and nonlicensed personnel. Due to the large turnover in auxiliary operators, management is particularly encouraged to give special attention to the on-the-job training of auxiliary operators.

### Functional Area

#### Radiological Controls and Environmental Protection

A special inspection to review the licensee's corrective actions for the Health Physics Appraisal findings was conducted during the last half of 1981 as a result of the licensee's "below average" rating in SALP 1. The general improvements found as a result of this inspection resulted in the Board's recommendation that the inspection frequency be returned to the routine schedule.

Licensee Comments

The licensee did not submit any written comments concerning this SALP Report.



## I. INTRODUCTION

The NRC has established a program for Systematic Assessment of Licensee Performance (SALP). The SALP is an integrated NRC Staff effort to collect available observations and data on a periodic basis and evaluate licensee performance based upon these observations. SALP is supplemental to normal regulatory processes used to insure compliance to the rules and regulations. SALP is intended from a historical point to be sufficiently diagnostic to provide a rational basis: (1) for allocating future NRC regulatory resources, and (2) to provide meaningful guidance to licensee management to promote quality and safety of plant construction and operation.

A NRC SALP Board composed of managers and inspectors who are knowledgeable of the licensee activities, met on October 22, 1981, to review the collection of performance observations and data to assess the licensee performance in selected functional areas.

This SALP report is the Board's assessment of the licensee safety performance at Consumers Power Company's Big Rock Point Nuclear Plant, for the period July 1, 1980 to June 30, 1981.

The results of the SALP Board assessments in the selected functional areas were presented to the licensee at a meeting held April 14, 1982.

## II. CRITERIA

The licensee performance is assessed in selected functional areas depending whether the facility is in a construction, pre-operational or operating phase. Each functional area normally represents areas significant to nuclear safety and the environment, and are normal programmatic areas. Some functional areas may not be assessed because of little or no licensee activities or lack of meaningful observations. Special areas may be added to highlight significant observation.

One or more of the following evaluation criteria were used to assess each functional area.

1. Management involvement in assuring quality.
2. Approach to resolution of technical issues from safety standpoint.
3. Responsiveness to NRC initiatives.
4. Enforcement history.
5. Reporting and analysis of reportable events.
6. Staffing (including management).
7. Training effectiveness and qualification.

However, the SALP Board is not limited to these criteria and others may have been used where appropriate.

Based upon the SALP Board assessment each functional area evaluated is classified into one of three performance categories. The definition of these performance categories is:

Category 1. Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2. NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3. Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

### III. SUMMARY OF RESULTS

<u>Functional Area Assessment</u>	<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
1. Plant Operations	X		
2. Radiological Controls and Environmental Protection		X	
3. Maintenance		X	
4. Surveillance		X	
5. Fire Protection		X	
6. Emergency Preparedness		X	
7. Security and Safeguards	X		
8. Refueling	X		
9. Licensing Activities		X	
10. Quality Programs		X	
11. Personnel Training		X	
12. Design Changes and Modifications		X	

#### IV. PERFORMANCE ANALYSES

##### 1. Plant Operations

###### a. Analysis

The overall plant management attitude and attention towards regulatory matters and inspector concerns is very good.

Twelve inspections have been performed during the evaluation period. Two minor items of noncompliance were identified by the resident inspectors during the period.

- (1) Deficiency for failure to review the caution tag log book on a semiannual basis as required by station administrative procedures.
- (2) Severity Level V noncompliance for failure to follow written operating alarm and valve lineup procedures.

Although no significant regulatory concerns were identified, it is felt that the licensee should continue to emphasize the importance of adherence to procedures to all levels of plant personnel. Further, with the large turnover in auxiliary operators the licensee is encouraged to pay special attention to the formal and on-the-job training for the effected individuals.

###### b. Conclusion

The licensee is rated Category 1 in this area.

###### c. Board Recommendations

Subsequent to the evaluation period the Board has noted recent indication of a downward trend in regulatory performance. Examples are, inadvertent disabling of an RDS channel and disabling of the diesel firepump firefighting capability. Actions of this nature should be minimized by implementation of a formalized auxiliary operator training program. The Board recommends no change in the current inspection program in this area.

##### 2. Radiological Controls and Environmental Protection

###### a. Analysis

###### (1) Radiological Controls

Two inspections, relating to refueling radiation protection and confirmatory measurements, have been

conducted during the evaluation period by the region based inspectors. Resident Inspectors also inspected this area.

Three items of noncompliance were cited, all dealing with failure to post radiation areas (Severity Level V noncompliance). All three items were cited during a seven month period and pointed to a weakness in the licensee's program for identifying radiation protection areas.

The refueling inspection included a partial review of corrective actions taken in response to the HP Appraisal. The licensee has made acceptable progress correcting the eight programmatic weaknesses identified during the HP Appraisal, including formalization of the ALARA Program. Although the licensee did not have any personal overexposures and had lower than average total personal exposures (man-rems), the power normalized exposure (man-rems per MWe) was significantly higher than average for Region III boiling water reactors. The high power normalized exposure appears to be attributable to the small plant capacity and the plant age.

Although radioactive effluent and radwaste transportation activities were not specifically inspected during this evaluation period, review of licensee reports did not identify any unplanned releases or significant problems in these areas. Total liquid and airborne radioactive releases (Ci) were about average for Region III boiling water reactors but airborne releases were significantly above the average when normalized for power (Ci/MWe). Both were well within Technical Specification limits.

The licensee achieved 19 of 20 agreements for sample results compared under the Confirmatory Measurements Program. The licensee expressed a willingness to review rejection criteria of his gamma spectroscopy system to assure that radionuclides present are quantified. He is also in the process of upgrading his spectroscopy system which will result in better nuclide identification.

b. Conclusion

The licensee is rated Category 2 in this area. This is an improvement over the last SALP evaluation period.

c. Board Recommendations

A special inspection to review the licensee's corrective actions for the Health Physics Appraisal findings was conducted during the last half of 1981 as a result of the licensee's "below average" rating in SALP 1. Because of the improvement noted in this inspection the Board recommends that the inspection frequency be returned to the routine schedule.

3. Maintenance

a. Analysis

Five inspections were conducted during the evaluation period. No items of noncompliance were identified.

The licensee is encouraged to more fully utilize the Quality Assurance and Control functions provided onsite in the planning, performance and review of maintenance activities. (See Function Area 10, Quality Programs, Board Comments for additional comments.)

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

None.

4. Surveillance and Inservice Testing

a. Analysis

(1) Surveillance

Eight inspections were conducted during the evaluation period. One minor item of noncompliance was identified:

Severity Level V noncompliance for failure to adequately review and document a temporary change to a surveillance procedure.

In addition, the licensee (via an LER) reported that a Technical Specification surveillance test was not performed in a timely manner.

No significant regulatory concerns were identified in the area of surveillance testing.

(2) Inservice Testing

Management controls are acceptable for the inservice inspections (ISI) conducted by Southwest Research Institute (SWRI). SWRI is the Consumers Power Company contractor for inservice testing at Big Rock Point. The records and record control systems are acceptable for ISI. The data reports demonstrate that the QA/QC requirements are met.

The qualification and training of SWRI personnel are in accordance with SNT-TC-1A, 1975 Edition, which is the document for qualification and training nondestructive examination (NDE) personnel.

Overall the licensee and ISI personnel are effective and demonstrate a good attitude. Observations of ISI activities included calibration, preparation of welds, performance of the examination and documentation.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

None.

5. Fire Protection and Housekeeping

a. Analysis

(1) Fire Protection

Fire brigade training was observed for both scheduled training and unannounced fire drills, which included preset fires. No items of noncompliance were identified.

The training provided by the licensee corporate staff appears to be comprehensive and effective.

(2) Housekeeping

Daily observation by the resident inspectors of general site conditions indicate good housekeeping practices are being adhered to.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

None.

6. Emergency Preparedness

a. Analysis

Routine region based inspections were suspended in this area to conduct nationwide appraisals of the new emergency preparedness plans submitted under changes to 10 CFR 50, Appendix E.

No overall inspection on emergency preparedness was performed during the evaluation period. Segments of the licensee's plan involving drills with local hospitals, site evacuation and emergency kit contents were reviewed by the resident inspectors. No items of noncompliance were identified.

Certain NUREG-0737 Task Items which may impact the Emergency Preparedness Program are still being evaluated by the staff. However, the NRC has required the licensee to install an early warning system, an upgraded meteorological system, minimum shift staffing, and submit designs for their emergency response facilities.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

An Emergency Preparedness Appraisal was performed in late November with the report due in February 1982.

7. Security and Safeguards

a. Analysis

Three inspections in this area were conducted by the Safeguards Section, and the resident inspectors routinely monitored security activities. Only one item of noncompliance was identified regarding background screening which did not represent a significant breakdown. The matter was corrected and other identified problems were normally handled in a timely manner.

There is a concern related to the effectiveness of the present alarm system. Corporate management has discussed the design and utilization problems with the NRC; however, there has been little progress in resolving the technical problems. Resolution of this concern has not been completely within



the control of the licensee. The licensee has implemented compensatory measures pending resolution of the problems.

The three major tasks facing the licensee are:

- . Implementation of the security force Training and Qualification Plan.
- . Implementation of the Safeguards Contingency Plan.
- . Resolving the technical problems and upgrading the effectiveness of the alarm system.

It is anticipated that the licensee will meet these commitments. This is predicated on the effective utilization of management systems and adherence to security plan commitments demonstrated in past inspections.

b. Conclusions

The licensee is rated Category 1 in this area.

Strong supervision at the site and close communication links with corporate security management continue to be a characteristic of this site. Corporate security management personnel are knowledgeable of problem areas and security program requirements and will support the site program. The morale of the contractor security force is very high.

c. Board Recommendations

The Board recommends maintaining the current inspection program frequency pending successful and adequate implementation of the Guard Training and Qualification Plan. At that time, this area should be a candidate for reduced inspection frequency.

8. Refueling Operations

a. Analysis

NRC inspectors found no significant areas of concern and no items of noncompliance in the areas of refueling operations and startup testing when compared with the Technical Specifications and the licensee's procedures.

One refueling outage was observed during the evaluation period. Inspections indicated that Licensee Management attention and involvement were oriented toward nuclear safety and a high level of performance was achieved with respect to operational safety.

b. Conclusion

The licensee is rated Category 1 in this area.

c. Board Recommendations

The Board recommends no change to the inspection program in this area.

9. Licensing Activities

a. Analysis

Generally, the licensee is responsive to NRC staff requests. The quality and timeliness of the licensee's responses have varied. For example, their responses to NUREG-0737 have been timely but have not agreed with all NRC requirements; however, they presented their positions clearly. Their responses to SEP Topic requests have frequently been late. The licensee is generally only reactive in response to NRC needs. One notable exception is the Probabilistic Risk Assessment (PRA).

This PRA was initiated by the utility and is an innovative approach to assessing the overall safety of the plant. The utility wants to use this PRA to identify plant modification in lieu of certain staff requirements identified in NUREG-0737 as well as other generic NRC requirements. The licensee personnel have a good working knowledge of regulations, guides, standards, and generic issues. Their personnel serve on owners group committees as well as industry standards committees. The technical competence is strongly complemented by a good understanding of the plant systems by the operations staff who have on the average over ten years experience at Big Rock Point.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

None.

10. Quality Programs

a. Analysis

A programmatic inspection of quality assurance program was not performed; however, quality activities are routinely observed by the resident inspectors during inspections in other areas. No specific strengths or weaknesses were identified.

A companywide reorganization and revamping of the QA/QC function is in progress. These changes will have an impact on the site.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

It should be noted that as a result of events at the Palisades site, a total revamping of the corporate QA Program is underway. The change involves both the QA Program and generation of a new set of documents known as Nuclear Operating Standards.

The Board also notes that the site QA/QC Department is being upgraded by the recruitment of additional QC inspectors. The upgrading has been hampered by the transfer of QC inspectors to new positions onsite. The vacant positions have now been filled via in-company transfers of two individuals; one reactor operator and one maintenance person.

The Board recommends additional NRC attention as changes are implemented at the site.

11. Personnel Training

a. Analysis

Two inspections pertaining to personnel training were conducted during the evaluation period. One item of non-compliance associated with the licensed operator training program was identified:

Severity Level V noncompliance for failure to provide accelerated retraining of individuals who did not meet the acceptance criteria during the annual requalification exam.

In the review of the general employee training program, several weaknesses were identified relating to the implementation of the program. These weaknesses did not represent major breakdowns in the overall training program. However, some of the items had been previously brought to the licensee attention indicating a lack of followup.

With the new training requirements associated with the TMI Action Items, the present size of the training department appears to be inadequate to handle both licensed and non-licensed training programs. The licensee has initiated steps to correct this deficiency at both the corporate and site levels.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

The licensee is responding positively by changing and upgrading the training program. The recent addition of new training instructors should greatly improve the licensed and non-licensed training programs.

12. Design Changes and Modifications

a. Analysis

One inspection was conducted during the evaluation period. The inspection concluded that the licensee's controls over Major Modifications and adherence to the controls were effective. One Severity Level VI noncompliance and several minor concerns regarding administrative controls were identified concerning the failure to follow procedure in the closeout of a Specification/Field Change prior to the closeout of the associated maintenance order.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Comments

None.

V. SUPPORTING DATA AND SUMMARIES

A. Noncompliance Data

Facility Name: Big Rock Point

Docket No. 50-155

Inspections No. 80-09 through 80-20

No. 81-01 through 81-08

<u>Functional Areas</u>	Noncompliances and Deviations Severity Levels						Categories			
	I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.
1. Plant Operations					1				1	
2. Radiological Controls					3					
3. Maintenance										
4. Surveillance					1					
5. Fire Protection										
6. Emergency Preparedness										
7. Security and Safeguards								1		
8. Refueling										
9. Licensing Activities										
10. Quality Programs										
11. Personnel Training					1					
12. Design Changes and Modifications						1				
TOTALS					6	1		1		1

B. Licensee Report Data

1. Licensee Event Reports

LERs No. 79-022 through No. 80-16 (7/1/79 - 6/30/80)

LERs No. 80-017 through No. 81-18 (7/1/80 - 6/30/81)

Licensee Proximate Cause Code Assignments:

<u>Cause Type</u>	Number LERs	
	7/1/79 - 6/30/80	7/1/80 - 6/30/81
Personnel Error	1	3
Design, Mfg., Constr/Install.	3	3
External	-	-
Defective Procedures	-	-
Component Failure	7	25 <sup>1</sup>
Other	<u>13</u>	<u>15<sup>2</sup></u>
Total Number	24	46

2. LER Evaluation

An evaluation of SALP 2 LERs indicates very good performance for Big Rock Point. Three personnel errors, each of which had minimal impact on plant safety, and no procedural errors were reported.

There is evidence of problems in root cause identification in three specific areas: (1) in repetition of RDS instrument drift reports prior to discovering that an equipment failure was responsible, (2) in repetition of RDS battery cell low specific gravity readings, and (3) in the number of emergency diesel generator problems, some of which were repetitive. It appears that more timely identification of "root causes" is necessary to prevent excessive repetition or numbers of events. See the table below for a summary of the events reported.

It should be noted that the increased frequency of LER's during the SALP 2 assessment period over the previous year is not reflective of degraded performance. It appears due to the cycle nature and schedule of refueling outages, annual surveillances, and modification outages experienced.

<sup>1</sup> Of the 25 "Component Failures" LERs, four (4) or 16% dealt with Low Specific Gravity on Battery Cells which was addressed in SALP 1.

<sup>2</sup> Of the 15 "Other" LERs, eight (8) or 53% dealt with RDS Level Transmitter 3183 which was addressed in SALP I. Three additional LERs or 20% dealt with slow starting times on the Emergency Diesel Generator.

Associated Event Groups and LERs Per Group

	<u>7/1/79- 6/30/80</u>	<u>7/1/80- 6/30/81</u>
(1) Design or equipment qualification problem identified.	1	3
(2) Reactor Depressurization System instrumentation setpoint drift.	10	9
(3) Specific gravity of Reactor Depressurization System battery cell below TS limit.	3	6
(4) Containment isolation valve leakage.	2	5
(5) Inadequate closure capability of containment purge isolation valves under LOCA conditions.	2	-
(6) Other	6	14
(7) Emergency diesel generator problems.		8
(8) MISV failure to close.		1

3. Significant Items

- (1) LER 80-23: Review of containment design during Steam Line Break indicated potential to exceed the temperature criteria used for accident environments.

Corrective Action: Design modification installed to initiate automatic containment spray system.

C. Licensee Activities

1. Major Refueling Outage October 31, 1980 to January 31, 1981.
2. Power limitations
  - (1) Restriction due to inability to perform flux wire runs in selected areas of the core.

(2) Restriction due to thermal hydraulic limits.

(a) Dry out time.

(b) MCHFR.

3. Significant Modifications

(1) Automatic Initiation of Containment Spray System.

(2) Selected valve position/hand switch position status board.

(3) Fire water system modification to allow for deluge coverage of switch yard. Previous design required manual action.

(4) Various modifications due to NUREG-0737.

D. Inspection Activities

No major team or special inspections.

E. Investigations and Allegations Review

None performed during evaluation period.

F. Escalated Enforcement Action

(a) Civil Penalties

None.

(b) Orders

None.

(c) Confirmatory Action Letters

None.

G. Management Conferences

November 24, 1980: Discussion of initial SALP program and findings.

No other special meetings were held to discuss Big Rock Point specifically. Some of the issues addressed in the meetings between Region III and Consumers Power Company (Palisades) have generic implications for Big Rock Point.