

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-155/82-12(DPRP)

Docket No. 50-155

License No. DPR-6

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49201

Facility Name: Big Rock Point Nuclear Plant

Inspection At: Big Rock Point Site, Charlevoix, MI

Inspection Conducted: June 12 through July 30, 1982

Inspectors: *K.R. Ridgway*
for G. C. Wright

8/17/82

K.R. Ridgway
for M. E. Parker

8/17/82

Approved By: *K.R. Ridgway*
for D. C. Boyd, Chief
Projects Section 1

8/17/82

Inspection Summary

Inspection on June 12 through July 30, 1982 (Report No. 50-155/82-12(DPRP))

Areas Inspected: Routine safety, resident inspection involving Operational Safety Verification, Monthly Maintenance Observation, Monthly Surveillance Observation and Fire Protection/Prevention Annual Inspection. The inspection involved a total of 157 inspector-hours onsite by two NRC inspectors including five inspector-hours during off-shifts.

Results: Of the areas inspected, one item of noncompliance was identified (Failure to provide written procedures for reactor coolant system level control see Paragraph 2).

DETAILS

1. Persons Contacted

- *D. P. Hoffman, Plant Superintendent
- D. E. DeMoor, Technical Engineer
- *A. C. Sevener, Operations Supervisor
- D. D. Wilks, Maintenance Supervisor
- *G. W. Dafoe, Property Protection Supervisor
- *J. J. Warner, Property Protection Operations Supervisor
- R. E. Berry, General Supervisor of Property Protection Engineering
- *C. E. Axtell, Chemistry/Health Physics Superintendent
- *J. R. Epperson, Associate Health Physicist
- *T. R. Fisher, Senior QA Administrator

The inspectors also contacted other licensee personnel including: Shift Supervisors, Control Operators and Maintenance personnel.

*Denotes those present at the exit interview.

2. Operational Safety Verification

The inspector observed control room operations, reviewed applicable logs and conducted discussions with control room operators during the months of June and July. The inspector verified the operability of selected emergency systems, reviewed tagout records and verified proper return to service of affected components. Tours of the reactor building and turbine building were conducted to observe plant equipment conditions, including potential fire hazards, fluid leaks, and excessive vibrations and to verify that maintenance requests had been initiated for equipment in need of maintenance. The inspector by observation and direct interview verified that the physical security plan was being implemented in accordance with the station security plan.

The inspector observed plant housekeeping/cleanliness conditions and verified implementation of radiation protection controls. During the months of June and July, the inspector walked down the accessible portions of the Core Spray and Containment Spray systems to verify operability.

These reviews and observations were conducted to verify that facility operations were in conformance with the requirements established under technical specifications, 10 CFR, and administrative procedures.

On June 17, 1982, while touring the control room, the inspector noted that the reactor coolant system level was being controlled by draining through V.S.C.--117, Shutdown system No. 1 pump discharge header drain valve. Standard Operating Procedure, SOP-3--Reactor Cleanup System, provides for blowdown through the reactor cleanup system. The cleanup system blowdown line was not being utilized for level control as the cleanup system was tagged out of service to allow a modification to be installed.

Review of control room logs revealed that the Shift Supervisor (S.S.) directed the operators to place a control rod drive (CRD) pump in service for CRD accumulator switch testing and use VSC-103, shutdown heat exchanger vent valve for lowering level. VSC-103 was subsequently secured and VSC-117 opened due to insufficient flow through VSC-103. VSC-117 is a manually operated drain valve located inside the containment, which was connected by hose to the containment floor drain. This method of water level control, without written procedures, continued for the next twenty four hours.

This method of controlling reactor coolant level was not the result of an emergency situation but rather a means of expediting CRD accumulation switch testing. As such, time was available to generate a procedure to control the activity or the accumulator testing could have been rescheduled.

After verifying that there was no procedure to control the activity the inspectors discussed the situation with licensee's management. At the conclusion of the discussion the inspectors requested that the activity be suspended. The licensee agreed to suspend the activity and rescheduled the accumulator switch testing to a time after the cleanup system was returned to service.

It is to be noted that prior to the commencement of the above described activities the control operator (licensed operator) told his management that he felt a procedure was needed to control the activity.

The failure to provide written procedures for the control of reactor coolant system level is considered an item of noncompliance. (82-12-01)

3. Monthly Maintenance Observation

Station maintenance activities of safety related systems and components listed below were observed/reviewed to ascertain that they were conducted in accordance with approved procedures, regulatory guides and industry codes or standards and in conformance with technical specifications.

The following items were considered during this review: the limiting conditions for operation were met while components or systems were removed from service; approvals were obtained prior to initiating the work; activities were accomplished using approved procedures and were inspected as applicable; functional testing and/or calibrations were performed prior to returning components or systems to service; quality control records were maintained; activities were accomplished by qualified personnel; parts and materials used were properly certified; radiological controls were implemented; and, fire prevention controls were implemented.

Work requests were reviewed to determine status of outstanding jobs and to assure that priority is assigned to safety related equipment maintenance which may affect system performance.

The following maintenance activities were observed/reviewed:

1. Control Rod Drive Hydraulic Control Unit (B-4 Scram in left valve).
2. Service Water Pump repair.

Following completion of maintenance on the Control Rod Drive and Service Water Systems, the inspector verified that the systems had been returned to service properly.

No items of noncompliance were identified.

4. Monthly Surveillance Observation

The inspector observed technical specifications required surveillance testing on the Reactor Protection Scram Sensor Test and verified that testing was performed in accordance with adequate procedures, that test instrumentation was calibrated, that limiting conditions for operation were met, that removal and restoration of the affected components were accomplished, that test results conformed with technical specifications and procedure requirements and were reviewed by personnel other than the individual directing the test, and that any deficiencies identified during the testing were properly reviewed and resolved by appropriate management personnel.

No items of noncompliance were identified.

5. Fire Protection/Prevention Annual Inspection

The inspectors examined the licensees installed fire detection and suppression systems, manual fire fighting equipment, fire brigade training, and administrative controls over combustible materials and ignition sources. These aspects of the fire protection program were reviewed using the requirements in the facility Technical Specifications and the fire protection/prevention program implementing procedures.

a. Areas of Inspection

(1) Procedures

- T30-35 - Fire Extinguisher Inspection
- T30-34 - Fire Protection Surveillance
- T180-16 - Functional Test of the Fire Detection system
- TR-70 - Fire Suppression Water System Functional Test and Pump Capacity Test
- TR-69 - Fire System Nozzle and Hose Inspection

(2) Reports

The inspector reviewed site tour inspection sheets and verified that deficiencies were effectively dispositioned.

(3) The inspectors examined combustible material and ignition source controls during tours of the following plant areas:

- (a) Reactor Containment
- (b) Turbine Building
- (c) Warehouse

(4) Observations

The inspector reviewed completed Maintenance Orders (MO) to verify that proper controls had been stated and that fire watches had been established.

No items of noncompliance were identified.

During the course of the review the inspector noted a number of items which were brought to the attention of both onsite and offsite licensee personnel.

- a. No policy on facial hair for fire brigade members (82-12-02)
- b. Training in the area of storage of flammable liquids need to be given (82-12-03)
- c. Qualifications of offsite contract personnel to perform as fire watches was questioned (82-12-04)
- d. Review of MO's for transient fire loading does not appear to be done (82-12-05)
- e. Number of SCBA's available for fire fighting per implementing procedures is not consistent with 10 CFR 50, Appendix R. It is noted that the number of SCBA's onsite is more than what 10 CFR 50 specifies (82-12-06)
- f. The licensee was asked to consider maintaining a minimum amount of equipment, at the two fire depots for fire fighting purposes (82-12-07)
- g. The licensee was asked to consider alternate means of controlling equipment used for fire watch activities (82-12-08)
- h. The licensee was asked to review the practice of using separate hot work procedures for onsite vs: offsite personnel (82-12-09)
- i. It appears that the MO form was modified and a check off dealing with fire safety was deleted. The deleting of the check off may be inconsistent with commitments made to the NRC. The licensee is reviewing the item (82-12-10)

The above items will be reviewed during a subsequent inspection by fire protection specialists from Region III.

6. Additional Items

During the inspection period the inspectors also participated in the initial SALP III report preparation and the resident inspector spent two and a half weeks on special assignment at the LaSalle County Station.

7. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection on August 5, 1982, and summarized the scope and findings of the inspection activities. The licensee acknowledged the inspectors comments.