Docket No. 50-155

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

Gentlemen:

Thank you for your letters dated June 1 and August 19, 1982, informing us of the steps you have taken to correct the noncompliance which we brought to your attention in Inspection Report No. 50-155/82-04(DETP) forwarded by our letter dated April 21, 1982.

We agree that full implementation of the corporate radiation safety standards at Big Rock Point should improve the overall radiation protection program. However, effective corrective actions for regulatory violations must be implemented in a timely manner and not be delayed pending full implementation of the corporate radiation protection standards.

We will review your corrective actions during a future inspection. Your cooperation with us is appreciated.

Sincerely,

Charles E. Norelius, Director Division of Engineering and Technical Programs

cc: Mr. D. J. VandeWalle, Nuclear Licensing Administrator Mr. D. P. Hoffman, Plant Superintendent

cc w/ltrs dtd 6/1/82 and **\$**/19/82: DMB/Document Control Desk (RIDS) Resident Inspector, RIII Ronald Callen, Michigan Public Service Commission

DMB; IEO6

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David J VandeWalle
Nuclear Licensing Administrator

General Offices: 1945 West Parnall Road, Jackson, MI 49201 * (517) 788-1636

June 1, 1982

Accession 212 8208100212

James G Keppler, Administrator Region III US Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

DOCKET 50-155 - LICENSE DPR-6 -BIG ROCK POINT PLANT - RESPONSE IE INSPECTION REPORT 82-04

NRC letter dated April 21, 1982 documented Region III IE Inspection Report No 82-04 conducted on March 15-18, 1982 of activities at the Big Rock Point Plant. The NRC requested a written response from Consumers Power Company within 30 days of the date of the letter to the inspection findings. Consumers Power Company letter dated May 18, 1982 requested a time extension for this response until June 1, 1982. The intent of this letter is to provide a written response to the two (2) items of non-compliance as reported in the NRC inspection report.

The enclosed information provides Consumers Power Company corrective/preventive measures to preclude recurrence and ensure that activities at Big
Rock Point Plant are in compliance with NRC requirements. As noted in the
enclosure, violation (1) was corrected immediately following the NRC
inspection. A conspicuous sign was posted in the high radiation (the fuel
pool surge tank) area investigated, and proper control measures were conducted
in this area in conformance with 10 CFR 20.203 (c)(1) and (2). A new
Radiation Worker Training Course designed to improve the understanding of the
radiation workers regarding the rules, hazards and responsibilities associated
with working in a nuclear power plant is being developed, and training is
scheduled to begin in the 3rd quarter, 1982.

As pointed out in the enclosed response to violation (2), violations of plant procedures were committed by personnel (eg, boilermakers) who do not routinely work in the plant. These personnel will be enrolled in the two day Basic Radiation Worker Training Courses for indoctrination in radiation protection requirements.

Consumers Power Company is also committed to institute a radiation work permit (RWP) program by September 30, 1982. This RWP program will provide guidance

James G Keppler, Administrator Big Rock Point Plant IE Inspection Report 82-04 June 1, 1982

to RWP-exempt personnel as to what is required on the job during the absence of a C&RP technician.

Consumers Power Company has developed and is implementing corrective action in compliance with 10 CFR 20, Big Rock Point procedures and other applicable standards and regulations. Thus, it is the judgment of Consumers Power Company that these actions constitute closure of the referenced IE inspection report.

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

Attachment - 3 pages

CONSUMERS POWER COMPANY Big Rock Point Plant

IE Inspection Report No 50-155/82-04 Response to NRC letter dated April 21, 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 April 21, 1982 which provides IE Inspection Report No 50-155/82-04. Consumers Power Company's response is dated June 1, 1982.

CONSUMERS POWER COMPANY

W Reynolds, Executive Vice President Energy Supply

Sworn and subscribed to me this 1st day of June, 1982.

Helen I Dempski, Notary Public

Jackson County, Michigan

My commission expires December 14, 1983