



Consumers
Power
Company

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Nuclear Licensing Administrator

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August 19, 1982

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 - SUPPLEMENTAL
RESPONSE - IE INSPECTION REPORT 82-04

NRC letter dated April 21, 1982 transmitted IE Inspection Report 82-04 concerning the radiation protection program at Big Rock Point Plant. That inspection report identified areas of concern and requested generic information pertaining to the repetitive nature of certain violations. Specifically, you requested that we describe our proposed corrective actions and why we expect them to be more successful in preventing future similar noncompliances than the corrective actions specified in our July 18, 1980 letter. Consumers Power Company letter dated June 1, 1982 provided our response to the violations identified in IE Inspection Report 82-04; and, our letter of July 1, 1982 provided a response to the generic information request. On further review of our July 1, 1982 letter, we have decided that it was not truly responsive to your concerns. Therefore, we are withdrawing our July 1, 1982 letter. The following discussion is intended to provide our official response to the April 21, 1982 generic request.

We share your concern with the repetitive nature of the violations, (specifically the problems with procedure adherence identified by both IE Inspection Reports 80-04 and 82-04), but, we also feel that substantial progress has been made in the radiation protection area at Big Rock Point Plant and that we are continuing to learn from our mistakes. We also acknowledge that the corrective actions that were identified in our response to IE Inspection 82-04 are similar to those identified in Consumers Power Company response dated July 18, 1980 to IE Inspection 80-04. This is especially true because these actions are presently and were then part of our comprehensive ongoing program to improve radiation protection practices at all of our nuclear plants; to develop a corporate radiation safety standard (RSS); and, to improve and upgrade staff and worker qualifications. The RSS addresses authority, training, technician and professional qualifications, corrective action requirements, instrument calibration requirements and ALARA procedures. The schedule for

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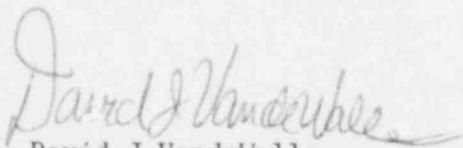
James G Keppler, Administrator
Big Rock Point Plant
IEIR 82-04 Supplemental Response
August 19, 1982

2

complete implementation of the RSS is March, 1983 (some aspects of the overall program, like the radiation work permit program, will be completed before March, 1983). This program was only partially complete at the time of IE Inspection 82-04. It is our belief that full implementation will lead to an improved regulatory performance.

In addition, on review of our June 1, 1982 letter we have concluded that the statement regarding the high radiation area posting (CP Co's response to violation No. 1) is misleading and we would like to clarify our response as follows: Specifically, we acknowledge that the high radiation area of concern and the access to it were not posted or controlled as required. However, it is important to note that unlike the high radiation areas identified in IE Inspection Report 80-04, the high radiation area found in this inspection was only accessible by ladder and the infraction was such only during the interval when the work crew took a break.

If you have any further concerns with this matter, we would be glad to meet with you to resolve them.



David J Vandewalle
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
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