

SALP 3

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. 50-155/82-16

Assessment Period

July 1, 1981 through June 30, 1982

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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 is to confirm the conversation between Mr. D. J. VandeWalle and Mr. R. D. Walker of the Region III staff scheduling October 28, 1982, at 10:00 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 NRC, Region III Office in Glen Ellyn, Illinois.

Mr. James G. Keppler, the Region III 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, Mr. D. P. Hoffman, Plant Superintendent, and managers for the various functional areas where problems have been identified attend this meeting.

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, 1981 through June 30, 1982.

Enclosure 2 to this letter, the SALP Report, documents the findings of the SALP Board and is for your review prior to the meeting. Subsequent to the meeting the SALP Report will be issued by the Regional Administrator.

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 will be placed in the NRC's Public Document Room when the SALP Report is issued.

If you have any questions concerning the SALP Report we will be happy to discuss them with you.

Sincerely,

J. A. Hind, Chairman
Region III SALP Board
Director, Division of Emergency
Preparedness and Operational
Support

Enclosures:

1. Summary of Significant Findings
2. Preliminary Big Rock Point SALP 3 Report (5 copies)

cc w/encls:

Resident Inspector, RIII

ENCLOSURE 1

Significant SALP Report findings for the Big Rock Point Plant.

General Observations:

While the licensee's overall performance remained satisfactory during the assessment period, there was an apparent failure to take remedial actions to correct weaknesses identified in the previous SALP assessment. This failure resulted in a deterioration of performance in the training area. Also, the licensee's failure to carry through on commitments in the area of Radiological Controls resulted in a lower performance rating in that area.

Functional Areas

1. Plant Operations

During the assessment period, the significance of personnel errors increased over the number for previous SALPs. The Board believes the licensee should evaluate training and administrative controls to determine if changes in these areas are needed to reduce the number of significant personnel errors.

2. Radiological Controls

The licensee's performance in the area of Radiological Controls has been rated as Category 3 which is a decline from the Category 2 rating during SALP 2. The licensee's failure to take effective corrective measures for identified noncompliances and to complete corrective actions for the Health Physics Appraisal findings is of regulatory concern. A corporate radiation safety standard which was designed to resolve previous NRC concerns was developed near the end of the SALP 2 period but was not yet implemented at the Big Rock Point Plant at the end of SALP 3. Additional licensee attention appears needed to implement improvements in the radiation protection program.

3. Training

The licensee's performance in the area of Training has been rated a Category 3 which is a decline from the Category 2 rating during SALP 2. The training staff has been increased; however, the licensee's adherence to the training program remains a regulatory concern. The Board encourages the licensee to review the training program to verify that all aspects of the program are being adhered to and that inconsistencies are corrected. The Board notes that subsequent to the assessment period the licensee informed Region III of corrective actions in this area. The actions as described by the licensee indicated positive performance in this area.

I. INTRODUCTION

The NRC has established a program for the 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 those observations. SALP is supplemental to normal regulatory processes used to insure compliance to the rules and regulations. SALP is intended primarily from a historical point to be sufficiently diagnostic to provide a rational basis for allocating future NRC resources and to provide meaningful guidance to the licensee's management to promote quality and safety of plant construction and operation.

A NRC SALP Board, composed of *the* staff members listed below, met on September 3 and 6, 1982, to review the collection of performance observations and data to assess the licensee performance in accordance with the guidance in NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance: a summary of the guidance and evaluation criteria is provided in Section II of this report.

This report is the SALP Board's assessment of the licensee safety performance at Big Rock Point Nuclear Plant for the period July 1, 1981 through June 30, 1982.

The results of the SALP Board assessments in the selected functional areas will be presented to the licensee at a meeting held on October 28, 1982.

SALP Board for Big Rock Point:

R. L. Spessard, Director, DPRP
C. E. Norelius, Director, DETP
C. J. Paperiello, Chief, EPPS Branch, DEPOS, Acting Chairman
W. S. Little, Chief, Engineering Inspection Branch, DETP
J. F. Streeter, Chief, Project Branch 2, DPRP
T. N. Tambling, Chief, Program Support Section
G. C. Wright, Senior Resident Inspector
R. L. Greger, Chief, Facilities Radiation Protection Section, DETP
R. L. Emch, Jr., Licensing Project Manager, ORB5
M. J. Jordan, Project Inspector, DPRP

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 Assessments</u>	<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
1. Plant Operations	X		
2. Radiological Controls			X
3. Environmental Protection and Confirmatory Measurements		X	
4. Maintenance	X		
5. Surveillance and Inservice Testing		X	
6. Fire Protection and Housekeeping		X	
7. Emergency Preparedness		X	
8. Security and Safeguards		X	
9. Refueling Operations	X		
10. Licensing Activities		X	
11. Training			X

IV. Performance Analysis

1. Plant Operations

a. Analysis

The resident inspectors routinely inspected licensee activities in this area. Based upon these inspections and other observations overall plant management attitude and attention to regulatory matters and inspector concerns was very good. Responsibility and lines of authority were well established. Communication with other support groups was generally effective. The lines of communication between plant management and the resident inspectors was good with significant improvement during the last third of the assessment period, resulting in a significant improvement in attention to regulatory matters and overall licensee performance. Events were promptly reported and corrective action in most cases was timely and well thought out. Although weaknesses were identified in training (see Section 11), minimal turnover has resulted in a high level of skilled licensed operators.

Overall management effectiveness is also evident by the general reliability of plant. During this assessment period there were few unplanned scrams and the reactor had a continuous run for 339 days before shutdown for refueling.

When the Plant Superintendent retired, the licensee made an appropriate and timely turnover of responsibilities to the new superintendent.

While compliance to the conditions of the license and regulations in this area has been good, two noncompliances and three other events were the result of operator errors or failure to follow procedures. These noncompliances and events were:

- (1) Severity Level V - Failure to follow operating procedure in that power level was increased by control withdrawal while turbine bypass valve was inoperable (81-16).
- (2) Severity Level IV - Two out of four RDS channels were inoperable during power operation when a minimum of three channels are required (81-16).
- (3) LER 81-15 - The diesel driven fire pump was rendered unable to respond to low fire header pressure.
- (4) LER 82-15 - The reactor mode switch was left in the REFUEL Position when required to be in the RUN position.
- (5) LER 82-20 - Two out of four RDS channels were not returned to service while in cold shutdown due to operator error in clearing a tagging order.

Items (2) through (5) were identified by the licensee and reported to the NRC. The licensee initiated timely and positive corrective action with one exception; for LER 82-22 the licensee initiated additional action to address inspector concerns. The above corrective actions were well thought out and addressed the causal factors.

While the number of personnel errors may not indicate an increasing trend at this time, there was a change in significance from previous SALP periods because they resulted in degradation of system operability.

b. Conclusion

The licensee is rated as Category 1 in this area.

c. Board Recommendations

The Board recommends that the licensee increase efforts to reduce the number of significant personnel errors by emphasizing the need for strict adherence to procedures, by assuring the adequacy of training, and by considering human factors.

2. Radiological Controls

a. Analysis

Three inspections of Health Physics Appraisal followup items, TMI Action Plan items, refueling radiation protection, and operational radiation protection and radwaste (82-11, 82-04, 82-11) were conducted during the evaluation period by regional specialists. The resident inspectors also inspected in this area. Four items of noncompliance were identified as follows:

- (a) Severity Level IV - Failure to post or control access to a high radiation area (82-04).
- (b) Severity Level IV - Failure to follow radiation protection procedures concerning smoking in contaminated areas, step-off-pad practices, control of work in contaminated areas, high radiation area access control, and contaminated vacuum cleaner use (82-04).
- (c) Severity Level V - Radiation Level exceeding 200 mR/hr on the external surface of a closed transport vehicle (81-14).
- (d) Severity Level IV - Failure to have an individual qualified in radiation protection procedures on each shift (81-11).

The latter item (81-11) is a repeat of a previous item of noncompliance for which corrective action was not taken by the licensee; a Confirmatory Action Letter was issued during this

assessment period to assure correction. The excessive radiation levels on the closed transport vehicle were cause for the State of Washington to temporarily ban radwaste shipments from Big Rock Point. The other two items of noncompliance are similar to general weaknesses identified during previous inspections and are cause for concern over the effectiveness of licensee corrective actions.

The licensee has been slow to correct the significant findings identified during the Health Physics Appraisal. These findings were first communicated to the licensee in June 1980. One of these findings remains uncorrected. The time required to correct the Health Physics Appraisal items is considerably longer than other Region III utilities. A corporate radiation safety standard, developed near the end of the previous SALP period, was designed to effect uniformity and improvement of the individual plant radiation protection programs and to resolve NRC concerns identified during the Health Physics Appraisals. The corporate radiation protection standard has not yet been implemented at the Big Rock Point Plant.

Worker radiation exposures (personrem) were lower than average for boiling water reactors but power normalized exposures (personrem/MWe) were significantly higher than the average for boiling water reactors. The high power normalized exposure appears to be partially attributable to the small plant capacity and the plant age. Worker radiation exposures during this SALP period were about equal to the average of the previous six years exposures. A formalized ALARA Program was implemented near the end of this assessment period.

Total liquid and airborne radioactive releases were about average for boiling water reactors. Airborne releases were significantly above the average when normalized for power (Ci/MWe). Both were well within Technical Specification limits. No unplanned releases were reported. Solid radwaste volume and activity were lower than average for boiling water reactors.

b. Conclusion

The licensee is considered to be in performance Category 3 in this area based on their failure to implement effective corrective actions for identified noncompliances and their lack of timeliness in correcting the Health Physics Appraisal significant findings. The Category 3 rating in this area is a reduction in the licensee's performance rating over the previous SALP period and is the second Category 3 rating in the three SALP assessment periods to date.

c. Board Recommendations

NRC inspection efforts of radiation protection activities should be increased. Increased plant and corporate management

attention should be directed to this area to ensure effective correction of identified regulatory problems and implementation of program improvements.

3. Environmental Protection and Confirmatory Measurements

a. Analysis

One Confirmatory Measurements inspection was performed as part of inspection 82-07 in which four sample media were collected and split with the licensee for comparative analyses. Twenty-three of twenty six agreements or possible agreements were achieved. For one disagreement, the licensee's Ge(Li) detector had a poor efficiency which in effect raised the lower limit of detection (LLD) above the actual value for the nuclide involved. A replacement analytical system was scheduled for operation by June 30, 1982. For two other disagreements, the licensee's results were approximately 40% higher than those of the NRC on an air particulate filter and were attributed to a nonhomogeneous deposition of radionuclides on the licensee's calibration filter (standard). The licensee agreed to evaluate his calibration technique.

In the area of radiological environmental monitoring, the licensee has a program beyond the minimal requirements defined in the Technical Specifications, conducted under contract by the Eberline Instrument Corporation. Sample recovery and collection appeared adequate. Semiannual and annual reports indicated no abnormal trends or anomalies attributable to plant operations.

b. Conclusion

The licensee is rated as Category 2 in this area.

c. Board Recommendations

None.

4. Maintenance

a. Analysis

Routine inspections in this area were conducted by the resident inspectors to assess the licensee's performance and compliance with the procedures and program, the requirements of their licenses, and the regulations. Within the scope of these observations and inspections no items of noncompliance were identified. Maintenance and modification activities were well managed and resources dedicated to this area were adequate and effectively used. First line supervisors and technicians were knowledgeable of their responsibility and skilled in their areas of responsibility. Management involvement was evident in the planning of activities and the minimal backlog of maintenance work.

The licensee implemented several changes during the assessment period that had positive effects on the improved performance in this area. These included:

- Increased QA/QC staffing and involvement.
- Increased dialogue and communication between the maintenance department and onsite QA/QC personnel.
- Staffing and organizational changes to strengthen the lines of responsibility and supervision.

One weak area that should be addressed is the quality of the maintenance procedures. The effectiveness and usability of procedures could be greatly enhanced if management would solicit comments on the procedures from the individual who must use them. Plant management has been made aware of this observation.

b. Conclusion

The licensee is rated Category 1 in this area.

c. Board Recommendations

None.

5. Surveillance and Inservice Testing

a. Analysis

(1) Surveillance

Portions of eight inspections by the resident inspectors and one by a regional specialist dealt with this area. One item of noncompliance was identified:

Severity Level V - Calibration procedures did not have acceptance criteria (81-12).

The resident inspectors have also noted that where acceptance criteria are stated, they often are not particularly conspicuous and as a result there is a potential to overlook them during review. This concern has been brought to the licensee's attention and their intention is to evaluate "acceptance criteria" placement during their long-term procedure review program.

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

(2) Inservice Testing

No inspections were conducted in this area during the SALP 3 period.

b. Conclusion

The licensee is rated Category 2 in this area. No significant strengths or weaknesses were identified.

c. Board Recommendations

None.

6. Fire Protection and Housekeeping

a. Analysis

(1) Fire Protection

This area was not inspected by region based inspectors during this SALP period. The resident inspectors did observe fire protection activity during their normal inspection activities.

Fire brigade training was observed for scheduled training drills. The licensee's response to an actual fire alarm (spurious) was also observed. In addition, although not observed, the licensee's response to an actual fire in the Turbine Generator Exciter was evaluated and the inspectors believe the actions taken by the individual detecting the fire, the fire brigade's response, and the operating staff's response were appropriate. No items of noncompliance were identified.

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

(2) Housekeeping

Daily observation by the resident inspectors of general site conditions indicate very good housekeeping practices.

b. Conclusion

The licensee is rated Category 2 in this area.

c. Board Recommendations

Normal inspection activity should continue. A detailed inspection was completed subsequent to this SALP period. A number of problems were identified and will be addressed in SALP 4.

7. Emergency Preparedness

a. Analysis

Emergency Preparedness activities at the Big Rock Point Nuclear Plant were observed during the licensee's emergency preparedness exercise and during our Emergency Preparedness Implementation Appraisal (EPIA). During the EPIA, NRC identified seven significant findings dealing with procedures, meteorology, emergency action levels, training, and backup analytical capabilities. No items of noncompliance were identified. The followup inspection for the EPIA has not yet been conducted, however, the actions described in the licensee's letter responding to the significant deficiencies appear to be appropriate.

The licensee conducted a full scale emergency preparedness exercise on April 5-7, 1982, satisfying the annual requirement. Twelve items were identified by the NRC for which additional attention was needed. The items involve communications, management of functions in the EOF and TSC, improvement of scenario preparation, improvement of procedures, training and management of resources.

NRR and Region III are currently reviewing a licensee request for an exception to the minimum shift staffing provision of NUREG-0654, Table B-1.

b. Conclusion

The licensee is rated Category 2 in this area based on the results of the Emergency Preparedness Appraisal and installation of the prompt notification system.

c. Board Recommendations

Increased licensee attention is needed in the preparation and execution of emergency exercises. The routine NRC inspection program will be maintained but with increased NRC attention in the preparation for the annual emergency preparedness exercise.

8. Security and Safeguards

a. Analysis

One physical protection inspection was conducted by region based inspectors during the assessment period. This inspection covered the major portions of the licensee's security program, i.e., security organization, access controls, detection aids, assessment aid, communications, and testing and maintenance. One item of noncompliance was identified:

Severity Level IV - violation for failure to detect a penetration of the protected area barrier conducted by the inspector (81-13).

Although this item is moderately significant, it represents an isolated incident. Generally, testing and maintenance of security related systems has been satisfactory.

This facility is one of the smallest in Region III. The security force is composed of a stable, closeknit, highly motivated, well trained group of individuals. Staffing and supervision of the force have been satisfactory. The security program has received adequate support from both site and corporate management.

The external audit function of the corporate Property Protection Department has been instrumental in identifying and correcting program deficiencies. This support represents a significant strength. There have been relatively few items of noncompliance identified by NRC inspectors, because of the audit role of the corporate office.

A significant weakness has been the recurring deficiencies associated with the existing perimeter alarm system. NRC concerns were provided to the licensee by NRR letter dated June 7, 1982. Progress towards resolving this longstanding issue has not been satisfactory. By letter dated July 28, 1982, the licensee informed the NRC of its intention not to replace the present system.

b. Conclusion

The licensee is rated a Category 2 in this area. This rating is based on the licensee's inability to resolve the perimeter alarm system problem.

c. Board Recommendations

Region III staff will work with NMSS to expedite resolution of the perimeter alarm system issue. Reduced onsite inspection activity may be appropriate.

9. Refueling Operations

a. Analysis

One refueling outage was observed during the assessment 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. No significant areas of concern and no items of noncompliance were identified in the areas of refueling operations and startup testing when compared with the Technical Specifications and the licensee's procedures.

b. Conclusion

The licensee is rated Category 1 in this area.

c. Board Recommendations

None.

10. Licensing Activities

a. Analysis

The evaluation was based on our evaluation of the following licensing activities:

- Equipment qualification
- Spent fuel pool expansion
- Responses to NUREG-0737 items
- Core reload
- Degraded grid voltage
- Probabilistic risk assessment
- Vessel pressure/temperature limits
- Systematic Evaluation Program
- Appendix R

(1) Management Involvement in Assuring Quality

There is consistent evidence of planning and assignment of priorities and decision making is usually at a level that insures adequate management review. However, in the Systematic Evaluation Program and the hearing process for the spent fuel pool expansion at Big Rock Point, there have been indications that licensee management has been less than fully supportive of the NRC's programmatic needs.

(2) Approach to Resolution of Technical Issues from a Safety Standpoint

The licensee generally demonstrates a clear understanding of and proposes viable and sound approaches to resolution of safety issues. The Probabilistic Risk Assessment is an innovative tool which the licensee developed to assist in these efforts. However, the Systematic Evaluation Program and the spent fuel pool hearing were two areas where resolutions were often delayed and approaches lacked depth.

(3) Responsiveness

The licensee generally makes timely responses which are technically sound. However, the Systematic Evaluation Program and the spent fuel pool expansion hearing process are two areas where considerable NRC effort and repeated submittals have been necessary to obtain acceptable resolutions.

(4) Staffing

Authorities and responsibilities are well defined, and in most cases staffing is ample. However, in the cases of the Systematic Evaluation Program and the spent fuel pool hearing process, staffing does not appear to be adequate and problems have occurred with the quality control of work by licensee contractors performing structural and seismic analyses.

b. Conclusion

In the functional area of licensing for Big Rock Point, the overall rating is Category 2. The overall rating would have been higher except for two problem areas. As indicated in the discussion of individual attributes there have been some problems in the areas of the Systematic Evaluation Program and the spent fuel pool expansion hearing process.

c. Board Recommendations

The licensee should provide better management of contractors who perform structural and seismic analyses work for Big Rock Point.

11. Training

a. Analysis

One inspection was conducted by a regional specialist during the assessment period. Three items of noncompliance were identified in licensed operator requalification training and in nonlicensed training:

- (1) Severity Level V - Failure to follow procedures, involving over 20 examples of failure to provide required nonlicensed retraining and failure to approve lesson plans used for licensed operator requalification training (82-09).
- (2) Severity Level V - Inadequate procedures. The Big Rock Point Master Training Manual contained diverse and conflicting requirements for General Employee Training (GET) retraining (82-09).
- (3) Severity Level IV - Failure to promptly correct QA audit findings. This was a programmatic problem since the corporate Nuclear Operations Training Department (NOTD) had no procedure which assured prompt corrective action for QA audit findings. Some findings remained uncorrected over eight months after the audit.

Other problem areas were identified during the inspection which were not items of noncompliance:

- (1) There are few scheduled lectures provided in the licensed operator requalification program in areas such as theory and principles of operation, plant protection systems, engineered safety systems and radiation control and safety, except as provided during an examination review session conducted immediately prior to the annual requalification exam.
- (2) Annual requalification exams for licensed operators did not appear to effectively evaluate the knowledge of the operators.
- (3) The licensee has not followed up on previously identified problems. Some problem areas related to training at Big Rock Point were previously brought to the licensee's attention and which were the same as or closely related to findings in NRC Inspection Report No. 82-09. These are:
 - (a) Conflicting retraining requirements were identified in NRC Inspection Reports No. 80-03, 81-05 and 82-09.
 - (b) Failure to conduct retraining as required was identified in NRC Inspection Reports No. 80-03, 81-05 and 82-09.
 - (c) INPO recommended in the 1981 report that the licensee "Develop an effective licensed operator requalification plan that defines program goals, content, implementation practices and responsibility assignments." The licensee responded saying that "The existing requalification program will be reviewed and revised in 1981 to ensure that program content is based upon operator needs and program administration is improved, consistent with the recommendation." There was apparently no revision of the licensed operator requalification program, and problems were identified in the NRC Inspection Report No. 82-09 in lecture program content and scheduling, and in examination practices.
 - (d) A QA department audit of Big Rock Point training was conducted September 28 - October 2, 1981, (Report No. A-QT-81-12). Several of these items were still open at the time of the inspection, over eight months later.

The licensee was made aware of these deficiencies by the organizations which identified them. (NRC, INPO or Consumer's Power QA). This indicates a continued lack of followup in certain areas.

The SALP 2 Report stated: "In 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."

Consumers Power Company's priorities in the training area were to improve training at the Palisades plant and to establish the training center at Midland. As a result, some corporate training program improvements which were to be implemented at all plants were not adequately managed and supervised at Big Rock Point. As a result of the Region III training inspection, CPGCo has begun to devote more management attention to improving training at Big Rock Point.

b. Conclusion

The licensee is rated Category 3 in this area. This is based on (1) poorly written or conflicting procedural requirements, (2) failure to follow procedures (3) licensed operator requalification program weaknesses, and (4) slow responses to certain previously identified deficiencies.

c. Board Recommendations

Although there has been improvement in some areas as increased training staff size and establishment of a strong central training department at the corporate level, additional management attention will be required to improve the training programs at the plant.

The Board recommends that the licensee promptly focus attention on resolving the problems in the training area and that the NRC devote additional attention to following the licensee's corrective actions. In addition, the Board recommends that additional licensee and NRC attention be focused on the new Nuclear Operation Department Standards as they are implemented at the site.

The Board notes that the inspection of training activities was conducted near the end of the SALP 3 period which precluded the licensee from responding in writing before the end of SALP 3 assessment period. After receiving the inspection report the licensee initiated a conference call with Region III personnel to discuss proposed and completed corrective actions. Actions described by the licensee taken in response to the inspection findings as well as Consumers Power Company's long term training program efforts were discussed. The long and short term actions as described by the licensee indicate an organized, aggressive approach. The licensee also appeared to be devoting a large effort toward solving fundamental problems rather than using a "band-aid" approach.

V. SUPPORTING DATA AND SUMMARIES

A. Noncompliance Date

Facility Name: Big Rock Point

Docket No. 50-155

Inspections: No. 81-09 through 81-19
 No. 82-01 through 82-11

(Note: Report No. 81-15
 was never used)

Functional Area Assessment	Noncompliances and Deviations Severity Levels					Dev.
	I	II	III	IV	V	
1. Plant Operations				1	1	
2. Radiological Controls				2	2	
3. Environmental Protection and Confirmatory Measurements						
4. Maintenance						
5. Surveillance and Inservice Testing						1
6. Fire Protection and Housekeeping						
7. Emergency Preparedness						
8. Security and Safeguards				1		
9. Refueling Operations						
10. Licensing Activities						
11. Training				1	2	
TOTALS	0	0	0	5	6	0

B. Licensee Report Data

1. Licensee Event Reports

LERs No. 81-14 through No. 81-27
LERs No. 82-01 through No. 82-20

Licensee Proximate Cause Code Assignments

<u>Cause Type</u>	<u>Number of LERs</u>
Personnel Error	4
Design, Mfg, Const/Install	1
External	0
Defective Procedures	2
Component Failure	22
Other	5
Total Number	34

2. LER Evaluation

An evaluation of the SALP 3 LERs indicates very good performance for Big Rock Point. In particular the corrective actions taken by the licensee on specific gravity, RDS level transmitter 3183, and slow diesel generator starting times problems appear to have been very successful in preventing repetition. On the other hand, the four personnel errors and two procedure deficiencies is an increase in preventable events and indicates that the licensee should increase their efforts to prevent these types of events.

C. Licensee Activities

1. Major Refueling Outage

February 6 to April 28, 1982.

2. Power Limitations

Power during the evaluation period was limited due to MCHFR and/or MAPLHGR limits.

3. Significant Modifications

- a. NUREG-0737 modifications are continuing.
- b. Backup water supply line to spent fuel pool was added.
- c. Remote manual makeup water supply to the Emergency Condenser was added to the facility.

D. Inspection Activities

The Emergency Response Plan review team conducted an evaluation of the licensee's Plan and Procedures during 1982.

E. Investigations and Allegations Review

None performed during the assessment period.

F. Escalated Enforcement Actions

1. Civil Penalties

None.

2. Orders

None.

G. Administrative Actions

1. Confirmatory Action Letters

a. Letter dated September 30, 1981, dealing with the designation and training of individuals to perform Health Physics/Radiation Protection activities on each shift.

b. Letter dated December 14, 1981, dealing with Emergency Preparedness deficiencies and resolution thereof.

2. Management Conferences

May 14, 1982: SALP 2 - (Inspection Report No. 82-10) Meeting in Jackson, Michigan.