



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

Patrick M Donnelly
Plant Manager

March 8, 1994

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 93-021; CORRECTIVE ACTION TO ADDRESS DEFICIENCIES IN THE STACK GAS HEATING SYSTEM NOT INCLUDED IN COLD WEATHER PROCEDURE.

During the period December 15, 1993, through February 1, 1994, Messrs. R. Leemon, C. Brown, I. Jackiw, and R. Twig of your office conducted a routine safety inspection at the Big Rock Point facility. NRC Inspection Report 50-155/93021 concluded that certain of Big Rock Point's activities appeared to be in violation of NRC requirements. The violation concerns a corrective maintenance activity that had been entered into the work planning system to correct deficiencies in the stack gas heating system on September 9, 1993. The work order was never listed in the cold weather preparation procedure, and the system froze on January 6, 1994.

Pursuant to the direction required by the report, find attached a Reply to the Notice of Violation dated February 22, 1994.

Patrick M Donnelly

James Kay for
Patrick M Donnelly
Plant Manager

140097

CC: Administrator, Region III, USNRC
NRC Resident Inspector - Big Rock Point

ATTACHMENT

9403150529 940308
PDR ADOCK 05000155
PDR

A CMS ENERGY COMPANY

JEO

ATTACHMENT

CONSUMERS POWER COMPANY
BIG ROCK POINT PLANT
DOCKET 50-155

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT 93021

MARCH 8, 1994

REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 93-021; CORRECTIVE ACTION TO ADDRESS DEFICIENCIES IN THE STACK GAS HEATING SYSTEM NOT INCLUDED IN COLD WEATHER PROCEDURE.

VIOLATION 93021

During an NRC inspection conducted from December 15, 1993, through February 1, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1993), the violation is listed below:

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for all structures, systems, components, and safety actions defined in the Big Rock Point Quality List. Section 5.2 of Chapter 13 of Volume 17 of the Big Rock Point Quality List requires procedures for operations and maintenance activities. Section 6.0 of Operations Procedure O-VAS-1, "Cold/Warm Weather Checklists," Revision 10, requires that any corrective actions necessary to complete the procedure be listed. Section 5.2.b of the same procedure includes the stack gas heating system.

Contrary to the above, nuclear work order (NWO) 12301946, a corrective maintenance activity, had been entered into the licensee's work planning system on September 9, 1993, to correct deficiencies in the stack gas heating system, but not listed in procedure O-VAS-1 when it was completed on October 19, 1993.

1) Reason for the violation.

The root cause of this violation has been attributed to lack of management oversight. The maintenance backlog is not routinely reviewed by management personnel with a focus on ensuring necessary work can be completed prior to significant weather changes or other events. Lack of this review precludes proper job prioritization and timely performance. Other contributing causes include insufficient verification of heat tape operability, and the cold weather checklist:

- Operability of the heat tapes in service cannot be verified by means of the "power available" light near the switch. A functional check of the tapes as a requirement of cold weather preparations would have identified a defective heat tape far enough in advance to prevent this problem.
- Although completed in October, the Cold Weather Checklist did not identify any problems with the stack gas heat tapes. Since the procedure required only that they be placed in service, and did not require any further verification that the tapes were operating properly, the checklist was unable to perform the function for which it was designed: identification of potential freezing concerns and verification of the availability of compensatory measures.

2) The corrective steps that have been taken and the results achieved.

On January 6, 1994, at approximately 1830, the on-duty shift discovered evidence that the stack gas sample line had frozen. Maintenance had deenergized both heat tapes on the stack gas monitor (SGM) sample lines as part of a troubleshooting procedure to determine which heat tape was bad. On January 7, 1994, Maintenance restored power to the heat tapes on one of the two SGM sample lines. After several hours of heating, a sample pump was placed back in operation. The Limiting Condition of Operation, Table 13-1, 5d, was then exited for the high range noble gas monitor at 1620 on January 7, 1994.

REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 93-021; CORRECTIVE ACTION TO ADDRESS DEFICIENCIES IN THE STACK GAS HEATING SYSTEM NOT INCLUDED IN COLD WEATHER PROCEDURE.

- 3) The corrective steps that will be taken to avoid further violations.
- a) Implement a means of reviewing the maintenance backlog at least monthly, and weekly in April and October to allow proper prioritization of work throughout the year; and to assure completion of required jobs prior to significant weather changes (i.e., Spring and Fall).
 - b) Revise O-VAS-1, Cold/Warm Weather Checklist, to clearly require initiation of a work request following determination that any required equipment does not meet the specifications of the checklist. The addition of operability verification steps for equipment whose function is currently not confirmed by the procedure should be considered. For all steps involving heat tapes, add requirements for functional tests to verify operability when placing in service.
- 4) The date when full compliance will be achieved.

The facility is currently in full compliance with NRC requirements. The corrective action discussed above to prevent recurrence will be accomplished by:

- a) MAY 1, 1994, and
- b) September 2, 1994, respectively.