



Consumers  
Power  
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

December 22, 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 -  
RESPONSE TO IEIR 82-17

IE Inspection Report No 50-155/82-17 dated November 22, 1982 transmitted two items of non-compliance found at Big Rock Point Plant. No response was required for Item 2. Our response to Item 1 is as follows:

Violation

- "1. 10 CFR Part 50, Appendix B, Criterion III, states in part (1) Measures shall be established to assure that structures, systems and components are correctly translated into specifications, drawings, procedures and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled; and (2) Measures shall be established for the identification and control of design interfaces and for coordination among participating design organizations these measures shall include the establishment of procedures among participating design organizations for the review, approval, release, distribution and revision of documents involving design interfaces.

Contrary to the above, the licensee's procedures governing interface between onsite and offsite organizations were not adequate to assure that design modification FC-510, Elimination of Potential Single Failures to Containment Vent Valves, was translated into plant drawings."

oc1282-0111b142

8301110394 830105  
PDR ADOCK 05000155  
Q PDR

DEC 27 1982

Response to Violation 1

A. Corrective Action Taken and Results Achieved:

Those drawings needed to safely operate the plant have been revised to reflect modifications made through Facility Change (FC) 510.

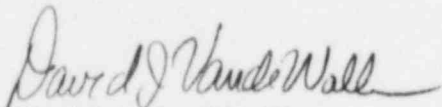
B. Corrective Action To Be Taken To Avoid Further Noncompliance:

In April, 1982, Nuclear Operations Department Standards (NODS) were issued to provide common administrative controls both to nuclear plants and off-site support departments. Two of the standards related to control of modifications (NODS P08 - Minor Modifications and NODS P09 - Major Modifications) specify the requirement to update drawings needed for plant operations prior to acceptance of a modified system. Plant administrative procedures related to the control of major modifications have been revised to conform to the NODS. Plant administrative procedures related to control of minor modifications are in the process of being revised to conform completely to the NODS, however, the requirements on updating drawings have already been implemented.

To provide additional assurance that modified systems are not accepted for service prior to having updated drawings available, all persons who may accept systems for service have been instructed, by memorandum, in the requirements for updated drawings.

C. The Date When Full Compliance Will be Achieved:

The actions already completed assure full compliance. Existing plant administrative procedures related to minor modifications are adequate with respect to assuring drawings are updated prior to acceptance of modified systems for service.



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