



CONSUMERS
POWER
COMPANY

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November 20, 1978

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Office of Inspection and Enforcement
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
IE REPORT 50-155/78-07

Consumers Power Company was requested by letter dated October 26, 1978 to respond to an item of infraction described in IE Inspection Report 50-155/78-07. This letter is to provide the required response to the four specific items cited.

Infraction

The Big Rock Point Technical Specification 6.8.1 requires that written procedures shall be . . . implemented . . . for all structures, systems, components, and safety actions defined in the Big Rock Point Quality List.

Contrary to the above:

1. A hydro test to verify the integrity of the NSSS after maintenance to components of the primary system was not performed as indicated by the procedure TV-10 (Hydro of NSSS) on September 8, 1978.
2. The reactor "MODE" selector switch was not placed in the "SHUTDOWN" position as required by SOP-1 (Reactor Operations) on September 5, 1978, following a normal plant shutdown for maintenance on the containment ventilation supply valve.
3. During the normal plant start-up on September 9, 1978, a stable reactor period of 19 seconds was maintained for approximately 2 minutes. The plant operating procedures, SOP-1 (Reactor Operations), GOP-1 (Plant Start-Up From Cold Shutdown), and GOP-2 (Plant Start-Up From Hot Shutdown), limit the stable reactor period to 30 seconds.

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4. While the plant was shut down on September 5 and 8, 1978, control rod E-4 scram capability was defeated on two occasions when the individual rod scram valves were mechanically blocked closed outside approved procedures SOP-1 (Reactor Operations) and SOP-30 (Control Rod Drive System).

Responses

Item 1

The need for a hydro test had been evaluated per ASME code requirements and it had been determined that a hydro test was not required for the activity which had taken place. This determination had not been documented. The TV-10 procedure and the start-up master checklist will be revised to specifically define maintenance activities requiring various levels of testing. These revisions will be completed prior to January 1, 1979.

Item 2

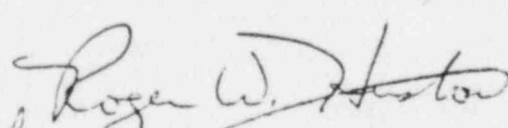
The Standard Operating Procedures (SOP-1) describe a generalized method for reactor shutdown without allowance for optional positions for the reactor mode switch as allowed by Technical Specification 1.2.5. Some work procedures and some test procedures used during a shutdown require other positions of the mode switch and this option has been routinely exercised at the discretion of the shift supervisor. The SOP-1 procedure will be revised prior to January 1, 1978 to allow such options.

Item 3

During critical approaches, a finite amount of time, although less than two minutes, is required to determine the stable reactor period. This time requirement will be defined more precisely and training will be conducted for the control operators prior to January 1, 1979.

Item 4

Under certain conditions, not presently covered by written procedures, blocking of scram capability on a single drive may be done without compromising the margin of safety as defined by the Technical Specifications. However, in the future, such actions will be implemented only by approved procedures. A precaution to this effect will be added to SOP-30 prior to January 1, 1979.


for David A Bixel
Nuclear Licensing Administrator

CC: Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement