

March 25, 1994

Docket No. 50-155

Consumers Power Company
ATTN: P.M. Donnelly
Plant Manager
Big Rock Point Nuclear Plant
10269 US 31 North
Charlevoix, MI 49720

Dear Mr. Donnelly:

This refers to the routine safety inspection conducted by Mr. C. Gill and others of this office from February 7 through 25, 1994. The inspection included a review of activities at the Big Rock Point Nuclear facility authorized by NRC Operating License No. DPR-6. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations of activities in progress, and interviews with personnel. The purpose of the inspection was to determine whether engineering and maintenance activities authorized by the license were conducted safely and in accordance with NRC requirements.

Overall, your engineering and maintenance activities were adequate. However, the inspection team noted several weaknesses, some of which were previously identified by your staff, involving control and assessment of your engineering and maintenance practices. Examples included the review of operating experience, Plant Review Committee approval, temporary modifications, peer inspection, deferral of preventive maintenance, self assessment, and completeness of engineering assessments. While individually these issues were not significant to plant safety, collectively they point out the need for additional management attention. Notwithstanding these concerns, we were encouraged by the positive initiatives you have recently undertaken to improve your engineering and maintenance activities, including system and roving engineers, preventive maintenance validation, and periodic and predetermined activity control. However, it was too soon to determine the effectiveness of these changes.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements as specified in the enclosed Notice of Violation (Notice). An unresolved item was also identified. The first violation was for failure to promptly correct an identified root cause for overloading the emergency diesel generator during testing. The violation is of concern because it took an apparently excessive period of time (16 months) to correct the root cause. The second violation was for failure to adhere to procedural requirements to document unacceptable conditions identified by the quality verification process. The violation is of concern because the

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apparent root causes indicated significant weaknesses in the peer inspection program. The unresolved item is a concern because some of the measured surveillance closure times for the Emergency Condenser outlet valves were less than the committed minimum closure time. Although the system operational parameters for the committed minimum valve closure time were different than those for the surveillance closure times, the Emergency Condenser system might have been operated in an unanalyzed condition. The potential could exist for the system to be subjected to significant water hammer under postulated design basis accident operational conditions. We request that you address the above concerns in your response to the Notice.

You are required to respond to this letter and you should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

The responses directed by this letter and the accompanying Notices are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

Geoffrey C. Wright, Chief
Engineering Branch

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report No.
50-155/94002 (DRS)

cc w/enclosures:

Robert A. Fenech, Vice President,
Nuclear Operations
OC/LFDCB
Resident Inspector, RIII
James R. Padgett, Michigan Public
Service Commission
Michigan Department of
Public Health
Big Rock Point, LPM, NRR
SRI, Palisades

yes
RIII
[Signature]
Gill/lc
3/25/94

RIII
[Signature]
Salehi
3/25/94

RIII
[Signature]
Tella
3/25/94

RIII
[Signature]
Shafer
3/25/94

RIII *yes*
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Phillips
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RIII
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Wright
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yes