

SEP 17 1982

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 refers to the routine safety inspection conducted by M. M. Holzmer of this office on June 21-25, 1982, of activities at Big Rock Point Nuclear Power Plant and on July 7, 1982, at the corporate office in Jackson, Michigan authorized by NRC Operating License No. DPR-6 and to the discussion of our findings with Mr. D. Hoffman at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as specified in the enclosed Appendix. A written response is required.

In addition to the noncompliance in Appendix A, we are concerned about the quality of your licensed requalification training program, especially the preplanned lecture program and the administration of the annual written examinations. While we recognize that your preplanned lecture program meets the 10 CFR 55, Appendix A requirements, we do not believe it meets the intent of 10 CFR 55 nor have we found it to be comparable in quality with the average program at other licensed power plants. Our concerns are described in more detail in Section 3 of the Report Details of the attached inspection report. We ask that you have a group or individual, independent of the Big Rock Point training organization, evaluate the licensed preplanned lecture program including the annual written exams as to their adequacy and report to us the results of the evaluation. Please respond to this letter

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describing what you intend to do to evaluate the adequacy of your requalification program including the time schedule to be followed.

Section 4 of the Report Details describe deficiencies in the General Employee training which have been identified previously during NRC and INPC inspections, but for which action has not been taken. We ask that you also respond to these concerns in your reply to this letter giving your planned resolution dates for the areas of concern. Mr. Little of the Region III staff discussed these two requested responses to our concerns in a telephone conversation with Mr. Hoffman on September 1, 1982.

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's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

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

Sincerely,

"Original Signed by C.E. Norelius"

C. E. Norelius, Director
Division of Engineering and
Technical Programs

Enclosures:

- 1. Appendix, Notice of Violation
- 2. Inspection Report No. 50-155/82-09 (DETP)

cc w/encls:

- D. J. Vandewalle, Nuclear Licensing Administrator
- D. P. Hoffman, Plant Superintendent
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- Ronald Callen, Michigan Public Service Commission

RIII
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Holzmer/jp
9/7/82

RIII
Pf
Peschel

RIII
R. D. W. Boyd
Boyd

RIII
W. J. Little
Little
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RIII
C. E. Norelius
Norelius
9/16/82