



Consumers
Power
Company

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Nuclear Licensing Administrator

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September 17, 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 IE INSPECTION REPORT 82-12

IE Inspection Report No 50-155/82-12 dated August 17, 1982 transmitted one item of non-compliance found at Big Rock Point Plant. Our response to this item is as follows:

Violation

Technical Specification Section 6.8.1 states: "Written procedures shall be established, implemented and maintained for all structures, systems, components and safety actions defined in the Big Rock Quality List."

Contrary to the above, the licensee failed to provide written procedures to control the reactor coolant system level on June 16 and 17, 1982.

Response to Violation

During cold shutdown, with fuel in the reactor and primary system water level at the steam drum elevation, the Shift Supervisor authorized use (without an approved written procedure) of a local manual drain in the shutdown system to accommodate excess water being supplied to the primary system because of operation of a control rod drive pump (about 25 gpm). Normally under these conditions, the standard procedure would be to utilize a remote manual controlled drain path through the reactor clean-up system. However, that system was not operable due to modifications. Primary system water level was maintained during the incident and no significant hazard beyond the failure to use the approved draining method can be postulated.

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James G Keppler, Administrator
Big Rock Point Plant
IEIR 82-12 Response
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Corrective Action Taken and Results Achieved

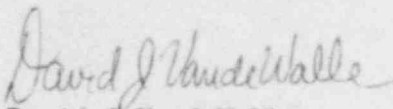
The unauthorized activity was terminated on June 17, 1982 following review by the Operations Superintendent. Thus, compliance with the specific incident was achieved.

Corrective Action to Prevent Recurrence

To clarify the requirements of Technical Specification 6.8.1 a training memorandum will be issued to Operations supervisory personnel emphasizing the requirement to control activities properly by either the use of temporary changes to existing procedures or by the preparation of new procedures.

Date When Full Compliance Will be Achieved

Full compliance related to the overall aspects of the incident will be considered achieved with the issue of the training memorandum by September 30, 1982.



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