



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

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Nuclear Regulatory Commission
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Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
RESPONSE TO INSPECTION REPORT NO. 50-155/90-17

Inspection Report No. 90-17 contained a Notice of Violation for failure to adequately complete radiation work permit documentation. In addition the cover letter to the report discussed an overall "inattention to detail" concern in general towards following procedures.

On December 11, 1990 Consumers Power Company representatives met with Region III personnel, to discuss the area of concern and our proposed corrective actions. The following provides a discussion of these issues and response to the violation. An extended response time was previously discussed with Mr. E. A. Plettner and Mr. R. W. DeFayette of Region III to hold the meeting with NRC personnel prior to submitting our response.

VIOLATION

As a result of the inspection conducted September 4 through October 15, 1990, and in accordance with 10 CFR Part 2, Appendix C - General Statement of Policy and Procedure for NRC Enforcement Actions (1990), the following violation was identified:

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

Section 5.3.1.c of Administrative Procedure Volume 1, Procedure 5.5 "Radiation Work Permit" Rev. 3, dated June 17, 1990, states in part, "The worker shall review the Radiation Work Permit package and/or be briefed on radiation protection requirements and survey data, then initial the Daily Entry Log next to his name to indicate they understand and will comply with the stated requirements."

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Contrary to the above, on September 18, 1990, three individuals failed to initial the Daily Entry Log (Form BRP052) next to their name. This is the same problem discovered during the 1989 refueling and maintenance outage that resulted in a Severity Level V violation documented in Inspection Report (155/89013(DRP)) and a Severity Level IV violation documented in Inspection Report (155/90002(DRP)).

DISCUSSION

Several years ago the Big Rock Point plant completely revised its RWP system to answer concerns from the plant staff and the Nuclear Regulatory Commission. The original system did not interface well with other plant operations and was primarily a dose tracking tool. Procedures were changed to accommodate an easier to follow system with provisions for a comprehensive job history file. As a result, retrievability of past RWP information and the quality of RWPs has improved tremendously. However, the system was still dependent on each individual worker filling in the appropriate information and initialing after locating the correct RWP.

Inspection Report No. 50-155/89013 identified a violation when individuals were found not completing all the required information on the RWP. The corrective action was to take more positive control of the RWPs by requiring almost all workers to contact a Health Physics technician prior to a work entry. The technician would then ensure the worker understood the RWP and initialed to indicate he agrees and will comply with the requirements. RWP compliance improved immediately. Approximately six general RWPs remained available for worker use to cover some routine activities such as decontamination, laundry, operator rounds, and routine surveys without first contacting a technician.

Inspection Report No. 50-155/90002 identified another procedure violation when workers were not completing all the information on the general RWPs covering the routine activities. The information not completed included social security numbers, job codes, exit dosimeter reading, and few initials. Part of the corrective action involved changing the procedure to relax the criteria for completion for general RWPs with the exception of initialing prior to work entry. These RWPs are of very low dose consequence with a very low probability of changing radiological conditions and are used primarily for dose tracking purposes. Signout for these RWPs is now required when changing RWPs and totaling weekly instead of daily, but initialing is still required prior to the first work entry to ensure the worker has read, understands, and will comply with the requirements. The Health Physics department reviews these RWPs weekly to status and verify compliance.

In the most recent inspection report, No. 50-155/90017, three individuals failed to initial the RWP prior to the work entry, a clear procedure violation. However, as stated in the report, the workers understood the requirements of the RWP and were following good radiation worker practices. When questioned by plant management following the incident, they simply stated that they forgot to initial the RWP.

Plant management has also reviewed RWP records for the past two years in an effort to quantify our progress in compliance and provide a measure of how effective corrective action has been. During 1989 a total of 7989 RWP entries were made with a total known number of missed initials of 44. Errors were also made in failing to enter exit doses, social security numbers, job codes, etc. (a procedure violation at that time) which totaled 570. These numbers represent a total procedural compliance rate of approximately 93%. As of November 15, a total of 6228 RWP entries have been made in 1990 including 11 known missed initials. Other errors (which are no longer a procedure violation) total 96. This represents a total procedural compliance rate of approximately 99.8%, a significant improvement over 1989.

CORRECTIVE ACTION TAKEN

Upon identification that three individuals failed to initial the RWP prior to work entry, discussions were held with the individuals to insure they were cognizant of the RWP requirements and required sign-offs were completed. As stated, in the inspection report, the workers were wearing proper clothing and satisfying the other requirements of the RWP. Individuals involved were also given a verbal warning, the first step of the Consumers Power disciplinary process.

A Quality Assurance surveillance was initiated immediately to determine extent of RWP non-compliance. Out of 123 entries made, no non-compliances were found and workers understood the requirements.

CORRECTIVE ACTIONS TO PREVENT RECURRENCE

On November 19, 1990, Consumers Power Company Vice-President of Nuclear Operations held meetings with all Departments at Big Rock Point to emphasize the importance of following procedures and other management directives. Attention to detail is essential to avoid safety problems and personnel injury.

A meeting of selected RWP users will be held to determine improvements for the proper completion of the RWP. Changes in the RWP program and/or form itself may result from the feedback.

To further establish management expectations, meetings will be held with all employees to discuss "attention to detail". These meetings will be held by the Plant Manager and Department Heads to emphasize the importance of the issue. Participation by the NRC Resident Inspector is welcomed to input the Commission perspective. These actions will be completed by March 31, 1991.

Expectations will also be established in 1991 to require first line supervisors to spend more time observing workers on the job site. Plant management will be expected to spend more time following work activities with plant employees to establish expectations. This will also include increased frequency of backshift and weekend visits by plant management.

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Big Rock Point management expects these actions to be more successful than past corrective actions due to the direct involvement and consistent application of expectations by department heads. We recognize and share the Nuclear Regulatory Commission's concern on this issue and agree that we need to raise our standards of acceptable performance.

William L Beckman (Signed)

William L Beckman
Plant Manager

CC: Administrator, Region III, USNRC
NRC Resident Inspector - Big Rock Point