



Consumers
Power
Company

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Dennis M Crutchfield, Chief
Operating Reactors Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
INTEGRATED ASSESSMENT OF ALL OPEN ISSUES (INCLUDING
ENVIRONMENTAL EQUIPMENT QUALIFICATION) AND GENERIC
LETTER 82-33 ISSUES) AND SCHEDULE FOR ISSUE RESOLUTION

Consumers Power Company management and NRC management met at NRC offices in Bethesda, Maryland on February 15, 1983 to discuss the concept of conducting a comprehensive integrated assessment of all open issues for Big Rock Point Plant (both regulatory and non-regulatory) and developing a living schedule for resolution of the important issues. On February 25, 1983, Consumers Power Company personnel met with NRC Staff in Bethesda to discuss integrated assessment and scheduling effort in greater detail. During this meeting, Consumers Power Company presented specific plans on how the assessment would be conducted and the schedule developed. The Staff's reaction to our presentation was favorable in that they stated that they preferred an integrated approach to resolve open issues. The purpose of this letter is to provide the NRC with our formal proposal for a comprehensive integrated assessment of open issues and the development of a living schedule for issue resolution.

Consumers Power Company will conduct a comprehensive integrated assessment of all open issues for Big Rock Point Plant. The assessment is considered comprehensive since it will cover open safety issues (including those identified by the NRC such as SEP topics and TMI requirements and issues identified by the Plant Review Committee) as well as non-safety issues which may affect plant operability and reliability.

The integrated assessment will provide the basis for determining which issues should be incorporated into the living schedule and consists of the following tasks:

- 1) Issue identification which consists of preparing a detailed scope of each issue which identifies the issue initiator's concern, assesses the impact on the plant, the impact on public safety, and provides an estimate of the

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resources necessary to resolve the concern. Identification of each issue will be performed by the project engineer assigned to the resolution of the issue. Issue identification (a necessary input to the remaining assessment tasks) commenced on March 3, 1983.

- 2) Issue categorization which consists of assigning each of the issues to one of the five following groups:
 - a) Required for Continued Operation;
 - b) Represents an Identifiable Risk Quantifiable by the Probabilistic Risk Assessment (PRA);
 - c) Represents an Identifiable Risk not PRA Quantifiable;
 - d) Addresses Uncertainties in Existing Assumptions or Analyses;
 - e) Affects the Conduct of our Operations.

Issue categorization, which is expected to be completed by our Continuing Risk Management Program team on or before April 1, 1983, provides a necessary input to the final task of issue ranking.

- 3) Issue Ranking which will be accomplished by a Technical Review Group (consisting of approximately six Consumers Power Company employees that are familiar with the issues as well as plant design, operation, risk and licensing). They will meet during the week of April 4, 1983 to:
 - a) Develop a logical basis for the ranking of issues;
 - b) Develop a list of issues ranked according to importance to safety and continued plant operation; and
 - c) Determine, based on such rankings, which issues should become part of the living schedule.

On or about April 15, 1983, Consumers Power Company will meet with the NRC Staff to solicit Staff review and comment on our ranked list of issues. In addition, Consumers Power Company plans to submit to the NRC this list and a description of the necessary Consumers Power Company and NRC actions required for the resolution of each of the issues by April 30, 1983.

Upon completion of the integrated assessment development of the living schedule for resolution of the issues will commence. Schedule development will involve the assignment of Consumers Power Company resources to the resolution of those issues that were ranked and selected for scheduling by the Technical Review Group. Those issues which are identified as being most important will be addressed first in the schedule. The schedule for issue resolution will also depend in part on the availability of resources and on future outage plans. It is currently expected that Consumers Power Company will complete a preliminary schedule by May 13, 1983. Consumers Power Company will meet with the NRC Staff on or about May 16, 1983 to discuss the preliminary schedule in an effort to obtain Staff review and comment. Consumers Power Company currently plans to submit the completed living schedule to the NRC by June 1, 1983.

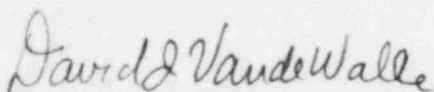
D M Crutchfield, Chief
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Shortly after the completed schedule is submitted, Consumers Power Company management and NRC management will reconvene to discuss the subsequent use of the schedule. Consumers Power Company is currently of the opinion that the schedule will be a living schedule in that the resolution of future issues will be assessed and if determined significant, will be appropriately entered alongside other open issues of similar significance in the existing schedule.

Two open regulatory issues merit specific discussion in this submittal. Recent rulemaking regarding Environmental Equipment Qualification (EEQ) requires that Consumers Power Company submit by May 20, 1983 a list of electrical equipment important to safety and a schedule for environmental qualification of such equipment. The EEQ issue will be assessed and its resolution scheduled as part of the integrated approach described above. The submittal of the requested list and schedule, however, will be part of our completed living schedule which is to be submitted by June 1, 1983. Consumers Power Company, therefore, requests NRC approval of the above submittal date extension. In addition, the issues addressed in Generic Letter 82-33 will be assessed and scheduled as part of our integrated approach and will be submitted as part of our living schedule on June 1, 1983 rather than in accordance with the schedules set forth in Supplement 1 to NUREG-0737.

In conclusion, it is the opinion of Consumers Power Company that the aforementioned integrated approach to the assessment and scheduling of current and future issues is essential for the continued operation of Big Rock Point. Such an approach will provide an effective use of finite resources to resolve the most significant issues as expeditiously as possible.



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