



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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

Patrick M Donnelly
Plant Manager

June 7, 1994

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 94-007; FAILURE TO FOLLOW PROCEDURES.

During the period March 17 through May 5, 1994, Messrs. R. Leemon, C. Brown, and S. Orth of your office conducted a routine safety inspection at the Big Rock Point facility. NRC Inspection Report 50-155/94007 concluded that certain of Big Rock Point's activities appeared to be in violation of NRC requirements.

Identified as not having major safety significance, the violation concerns a failure to follow procedures. A turbine related sensing line valve, VTG-1A, was not verified open before resetting the turbine Initial Pressure Regulator (IPR).

Pursuant to the direction required by the report, find attached a Reply to the Notice of Violation.

Patrick M Donnelly
Plant Manager

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

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ATTACHMENT

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PDR ADDCK 05000155
Q PDR

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ATTACHMENT

CONSUMERS POWER COMPANY
BIG ROCK POINT PLANT
DOCKET 50-155

REPLY TO A NOTICE OF VIOLATION
INSPECTION REPORT 94007

JUNE 7, 1994

REPLY TO A NOTICE OF VIOLATION - NRC INSPECTION REPORT 94-007; FAILURE TO FOLLOW PROCEDURES.

VIOLATION 94007

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained for all structures, systems, components, and safety actions defined in the Big Rock Point Quality List. Section 5.2 of Chapter 13, Volume 17 of the Big Rock Point Quality List requires procedures for operations and maintenance activities.

Section 6.4.1.d of Operating Procedure SOP-13, "Turbine Generator System," Revision 139, requires the operator to open or check open the turbine initial pressure regulator (IPR) Sensing Line Valve, VTG-1A.

Contrary to the above, on March 22, 1994, the licensee failed to ensure that VTG-1A was open before resetting the IPR.

This is a Severity Level IV violation (Supplement I).

Consumers Power Company's response is provided below.

1) Reason for the violation.

Consumers Power Company agrees with the violation as stated.

This is the second time in recent history this valve was left closed during a plant start up. On 8/18/92, VTG-1A was found closed and corrective action was implemented to prevent recurrence. However, several corrective actions noted below failed to prevent the recurrence of this event:

1. A new maintenance work instruction #WI-TGS-M-001 for testing and calibration of the IPR was revised to include an independent verification of VTG-1A valve in the open position.
2. The Instrumentation & Control (I&C) department created a "flag" system to identify valves operated by I&C not controlled by procedure to ensure normal valve line up is restored.
3. Operations department revised the section of SOP-13, Turbine Generator System, dealing with resetting of the IPR to include a check of valve position prior to reset.

The following reasons describe why the preceding barriers failed to prevent recurrence; and are noted by corresponding item number as shown above:

1. The maintenance work instruction for IPR calibration included an independent verification of VTG-1A valve position but the actual work instruction used was only partially completed. Per the turbine work supervisor, the final section, Preparation for Service (which includes the valve position verification, as well as many other sections which were not applicable for a partial calibration of the IPR that was being done), were not completed. In addition, the original work instruction was not with the work order. The administrative review of the completed work order did not notice the missing work instruction. A partially completed copy was obtained from a visiting company turbine inspector who assisted on the job. The original has not been located.

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If followed, this work instruction may have averted this incident. The turbine work was performed by a contractor (the original equipment manufacturer) with the turbine system engineer overseeing their work. The system engineer treated the work instruction as an informal guide and did not keep close control of it. Turbine work has a history of minimal work control (minimal work order guidance, procedures, work instructions, etc) due to not being safety-related and done by offsite people with turbine (but not plant) experience. This coupled with the fact that this work instruction had been used as a guide for validation purposes and not a formal work instruction until recently also was a factor in the way it was treated. Work instructions are a recent tool just instituted roughly 9 months ago with few plant people having used them.

2. The Instrument & Control (I&C) department was not involved in this particular work and therefore the system to identify valves operated by I&C was not utilized here.
3. In accordance with SOP-13, Turbine Generator System, an operator did make an attempt to verify that VTG-1A was open prior to placing the IPR in service, but failed to follow correct operator practices in doing so. Operations Administrative Procedure 2.1.4, Plant Status and Equipment Control, Section 5.11.1, instructs operators in the proper method to check a valve in either the open or closed direction. In this case the operator should have operated the valve in the closed direction slightly and then turned it fully open. When attempted by the operator, the small manual valve would not turn in either direction. Touching the down stream piping and finding it warmer than expected, the operator concluded the steam sensing isolation valve must be in the open position.

2) The corrective steps that have been taken and the results achieved.

When transferring to IPR control with the sensing valve in the closed position on March 22, the IPR "sensed" no pressure and closed the turbine admission valves in an attempt to raise pressure. The IPR operated exactly as it should have.

First attempts by the operators to open the valve were unsuccessful. A valve wrench had to be used and the IPR sensing valve was eventually opened, allowing the IPR to establish pressure control.

3) The corrective steps that will be taken to avoid further violations.

The personnel involved have received the appropriate disciplinary action in accordance with Consumers Power Company policy. In addition:

1. Current practices within the maintenance department concerning procedure use and adherence, as well as work instructions and work order job plans, will be dispositioned. Management expectations will be re-established on the necessity to use these documents in the field at the job site, as they were intended; and to follow them, minimizing reliance on memory, to produce consistent, good results.

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2. The training department will review this incident with all departmental groups responsible for verifying valve positions.

All of these actions will be completed by the end of the third quarter, 1994.

- 4) The date when full compliance will be achieved.

The facility is currently in full compliance with NRC requirements.