



Consumers  
Power  
Company

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October 19, 1982

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 - ADDITIONAL INFORMATION  
ON PROPOSED SHIFT TECHNICAL ADVISOR POSITION

Consumers Power Company submitted a proposed Technical Specification change on June 25, 1982 to address the Shift Technical Advisor position. Also, on April 1, 1982 we submitted documents which included analysis of minimum shift complement needs. These submittals were further supported by discussions with the NRC staff on June 28, 1982 (see NRC letter dated June 30, 1982 - Summary of Meeting).

Consumers Power Company committed to provide additional information which would demonstrate that our proposed minimum shift staff would provide adequate coverage for both normal and emergency conditions. We have reviewed both our Big Rock Point Plant Administrative Procedures, Site Emergency Plan (SEP) and Site Emergency Plan Implementing Procedures (SEPIP). For all actions that originally were assigned to an On-Duty Shift Technical Advisor, we have determined that they are adequately covered by our proposed minimum shift staff and on-call personnel.

Specifically:

1. The Operator Action Event Tree analysis has demonstrated that the minimum shift complement is capable of diagnosing plant conditions during potential accidents and taking appropriate action.
2. Dose assessment of potential and real radioactive releases will be covered by both on and off-site personnel who have adequate training and information to perform required analysis. Both pre-release and actual dose assessment is provided without detracting from control room functions.

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D M Crutchfield, Chief  
Big Rock Point Plant  
Shift Technical Advisor Position  
October 19, 1982

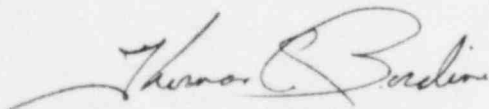
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3. The on-call Technical Advisor will respond (report) to the plant to support the Site Emergency Director in the event that an alert, site emergency or general emergency is declared.
4. The "Communicator" role has been assigned to a plant security officer who has been trained and is qualified to make the immediate notification required by 10 CFR 50, Appendix E and our Site Emergency Plan. The notifications will include but are not limited to:
  - a. On-Duty Superintendent (Site Emergency Director)
  - b. On-Call Technical Advisor
  - c. On-Call Chemistry/Radiation Protection individual (assists in dose assessment)
  - d. Consumers Power Company Power Control
  - e. Charlevoix County Sheriff
  - f. Michigan State Police (Petoskey)
  - g. NRC

Changes in responsibilities identified above will be included in the plant Administrative procedures, SEP and SEPIP as soon as the NRC approves the Technical Specification Change.

In summary, Consumers Power Company has thoroughly evaluated its emergency response capability for the Big Rock Point Plant and determined that the proposed minimum shift complement can adequately respond to abnormal site conditions and that the minimum shift staff and on-call personnel provide the necessary protection for the public in the event of an emergency. Plant conditions can be monitored and corrective action taken with the minimum shift staff. Emergency notifications, dose assessment and determination of public protective action recommendations can be made by on-site personnel supported by the plant's on-call personnel.

This additional response closes our June 28, 1982 commitment. We are confident that it will provide you the necessary information needed to expeditiously respond to our Technical Specification Request via issuance of the Amendment and Safety Evaluation Report.



Thomas C Bordine  
Staff Licensing Engineer

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