



Consumers  
Power  
Company

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October 15, 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 82-09

IE Inspection Report No 50-155/82-09 dated September 17, 1982 transmitted three items of non-compliance found at Big Rock Point Plant. Our response to these items is as follows:

Violation

"1. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings... and shall be accomplished in accordance with these instructions, procedures and drawings."

Consumers Power Company has committed in quality assurance program Topical Report CPC-2A, Rev. 0 to ANSI N18.7-1976, through Regulatory Guide 1.33, Rev. 2. ANSI N18.7-1976, paragraph 5.2.2, states in part, "Procedures shall be followed..."

The Consumers Power Company's Nuclear Operations Training Department Procedure Number 3, Revision 0, dated September 3, 1981, states in part, "The Training Supervisor of the particular location shall approve Lesson Plans used at his/her location."

- a. Contrary to the above, several of the licensed operator requalification training lesson plans, implemented after September 3, 1981, were not approved by the Training Supervisor.
- b. Contrary to the above, General Employee Retraining was not conducted as required by the Big Rock Point Plant Manual, Volume 18, "Master Training Plan".

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Response to Violation 1

A. Corrective Action Taken and Results Achieved:

- a. A survey of all lesson plans in use by the Big Rock Point training staff is underway. Those which are found without evidence of approval by the Training Supervisor will be reviewed by appropriate personnel and then approved by the Training Supervisor.
- b. The principal cause for this problem has been identified as the ambiguity and conflicting statements found in the existing procedure. Agreement has been reached between the Big Rock Point Plant management and the Training staff at Big Rock Point on a plan to separate the plant's commitment to training from the Training Procedures, both clarifying training requirements, and providing clear, unambiguous guidance to the instructors.

B. Corrective Action To Be Taken To Avoid Further Noncompliance

- a. Training procedures are being revised to ensure all members of the training staff have a clear understanding of their responsibilities and the steps necessary to the complete performance of their jobs.
- b. Training requirements will be clarified for incorporation into appropriate plant procedures. The training requirements will be such that the plant staff, the training staff, and individual employees will be readily able to recognize specifically what training is required.

C. The Date When Full Compliance Will Be Achieved:

- a. The survey of all lesson plans will be completed by November 1, 1982.
- b. Procedures will be revised and clarified by January 1, 1983. Training for personnel found to be overdue following the clarification of requirements will be completed by March 1983. Emphasis will be given to assuring that any deficiencies in training for licensed personnel will be completed in 1982.

Violation

"2. 10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instruction, procedures, or drawings, of a type appropriate to the circumstances..."

Consumers Power Company has committed in quality assurance program Topical Report CPC-2A, Rev. 0, to ANSI N18.7-1976, through Regulatory Guide 1.33,

Rev. 2. ANSI N18.7-1976, paragraph 5.3, states in part, "Activities affecting safety at nuclear power plants shall be described by written procedures of a type appropriate to the circumstances..."

Contrary to the above, the Big Rock Point Plant Manual, Volume 18, "Master Training Plan", is not appropriate since it contains conflicting requirements for retraining personnel in several areas, including quality assurance, applicable QA procedures and General Employee Training (GET) topics."

Response to Violation 2

A. Corrective Action Taken and Results Achieved:

Since the referenced document is a plant procedure, the Nuclear Operations Training Department (NOTD) staff has met with plant management, and agreed upon an action plan to resolve these conflicts. This plan will separate the plant's commitment to training from the description of how the Training Department functions, and clearly identify the training required for each plant employee.

B. Corrective Action To Be Taken To Avoid Further Noncompliance

The referenced document, Volume 18 of the Big Rock Point Plant manual will be restructured, or eliminated, with the necessary information included in appropriate plant or Training department procedures. Conflicting statements will be resolved, and both training requirements and responsibilities for training will be clearly stated.

C. The Date When Full Compliance Will Be Achieved:

As specified in item 1C above, the procedures will be restructured, revised and clarified by January 1, 1983.

Violation

"3. 10 CFR 50, Appendix B, Criterion XVI, states in part, "Measures shall be established to assure that conditions adverse to quality, . . . are promptly identified and corrected."

Consumers Power Company has committed in quality assurance program Topical Report CPC-2A, Rev. 0, to ANSI N18.7-1976, through Regulatory Guide 1.33, Rev. 2. ANSI N18.7-1976, paragraph 5.2.11, states in part, "The program shall provide measures to ensure that conditions adverse to plant safety, such as failure, malfunctions, deficiencies, deviations, defective material and equipment, abnormal occurrences and noncompliances are promptly identified and corrected."

Contrary to the above, the procedures which exist to control corrective action failed to assure that conditions adverse to quality which were

identified in a QA audit of the Nuclear Operations Training Department (NOTD) were promptly corrected.

For example, QA audit report findings of NOTD training activities at the Big Rock Point Plant which were processed in accordance with the appropriate written procedures, were neither evaluated for corrective action nor corrected nearly 8 months after the audit report was issued.

Response to Violation 3

A. Corrective Action Taken and Results Achieved:

A Nuclear Operations Training Department Corrective Action procedure has been prepared. It is designed to ensure that needed Corrective Actions are brought to the attention of the NOTD Director, so that appropriate priorities are set on the allocation of resources to correct deficiencies and prevent recurrences. The findings of the specific audit addressed by this item are being aggressively pursued for prompt close out. Of the six findings in that audit, two are closed out, and two others have been completed excepting the final QA signoff.

B. Corrective Action To Be Taken To Avoid Further Noncompliance

The items still outstanding involve substantial effort at revision of procedures, since they both identify inadequacies in the existing procedures. The implementation of a Nuclear Operations Training Department (NOTD) Corrective Action Procedure and the revision to training procedures at Big Rock Point, will prevent recurrence of deficiencies of this type with regard to training.

C. The Date When Full Compliance Will Be Achieved:

Action taken to correct this violation will be completed with the implementation of the NOTD Corrective Action Procedure which is scheduled for completion by November 1, 1982. Revision of Big Rock Point training procedures will be completed by January 1, 1983.

In response to the above findings we share the concerns expressed in your cover letter and have already initiated actions. Based upon our own observations, and exit interviews with your inspectors, Consumers Power Company has already taken steps to improve the quality of training conducted for Big Rock Point personnel. With respect to Section 3 of the IE Inspection Report, Requalification Training, Consumers Power Company Nuclear Operations Training Department has:

- A. Appointed a senior staff member to oversee the training function at Big Rock Point on an interim basis. He has been charged specifically with addressing the concerns expressed in the September 17, 1982 inspection report and cover letter. In so doing, it will be his responsibility to

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show by example and precept that it is our intention to perform to requirements.

- B. Completed preliminary evaluation of the conduct of the requalification program at Big Rock Point. Plans for 1983 requalification training are being made to address the concerns expressed in the IEIR and the results of this preliminary evaluation. A thorough evaluation is continuing and will be completed by November 1, 1982. Any deficiencies not addressed by action already undertaken at that time will be addressed by corrective action initiated by the evaluator. The NOTD senior staff member overseeing the training function at Big Rock Point is performing this evaluation. A further report on the completed requalification evaluation and any further recommendations resulting from it will be forwarded to you by December 1, 1982.
- C. Arranged for the preparation of the 1982 operator and senior operator requalification examinations to be prepared and scored by offsite senior staff personnel who have had no direct involvement with conduct of training administered to each group of licensees commencing in October. Results of these examinations will be utilized in planning 1983 requalification lectures.

With respect to your cover letter concerns specified by Section 4, Training, of the IE Inspection Report, Consumers Power Company Nuclear Operations Training Department has:

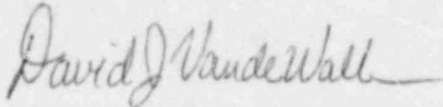
- A. Devised an action plan with the plant superintendent's concurrence that will separate the plant's training commitment from the description of how the Training Department functions. This will clearly identify the training required for each plant employee. The training procedures will then be the responsibility of only the training staff. This will clarify both the requirements and the responsibilities, eliminating conflicts. In addition, this will simplify the task of ascertaining that each individual has indeed received the required training. This work is already underway, and the revised Training Manual for the training staff will be completed by January 1, 1983. The revisions to the plant training requirements documents will be completed and incorporated into the plant's procedures by January 1, 1983.
- B. Steps have been taken to resolve the QA audit findings referenced in your report, and ensure that they are addressed in a timely fashion in the future. This will be assured by implementation of the Nuclear Operations Training Department Corrective Action Procedure, which is scheduled for completion by November 1, 1982.

In addition, the Nuclear Operations Training Department has taken the first steps to initiate a Quality Improvement Process to change our management style from one of reaction, to one of action and prevention. The first sessions with training staff members were enthusiastically received, and our future

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management actions and decisions will be those necessary to maintain the enthusiasm and support of these dedicate professional trainers.



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Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation  
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NRC Resident Inspector-Big Rock Point