

JUN 03 1994

Docket No. 50-155

Consumers Power Company
ATTN: P. M. Donnelly
Plant Manager
Big Rock Point Nuclear Plant
10269 US 31 North
Charlevoix, MI 49720

Dear Mr. Donnelly:

Enclosed for your review, is the Systematic Assessment of Licensee Performance (SALP) 12 Report for the Big Rock Point Nuclear Power Plant, covering the period January 1, 1993, through April 30, 1994. As discussed between Mr. Mike Bourassa of your staff and Mr. Monte Phillips of this office, a meeting to discuss this report with you and your staff has been scheduled at the Holiday Inn in Petoskey, Michigan, on June 21, 1994, at 1:00 p.m.

During this meeting you are encouraged to candidly discuss any comments you may have regarding our report. While this meeting is considered a presentation and discussion forum between Consumers Power Company and the Nuclear Regulatory Commission (NRC), the meeting will be opened to any other interested parties as observers.

In accordance with NRC policy, I have reviewed the recommendations resulting from the SALP Board assessment and concur with their ratings. It is my view that the conduct of nuclear activities in connection with Big Rock Point facility was, on balance, good. While inconsistent in some areas, your performance has generally shown improvement. It is significant that two of the functional areas receiving Category 3 ratings during the previous assessment period had improved to Category 2 performance. In great measure improvements resulted from increased senior management involvement and oversight, which will need to continue if performance inconsistencies are to be eliminated. All of the functional areas received Category 2 ratings.

In the area of Operations, while management changes and program improvements were beginning to improve safety focus as shown by the now routine use of good team briefings, some weaknesses continued to exist in configuration control, attention to detail, and the lack of an overall aggressive safety focus.

Overall performance in the area of Maintenance continued the improving trend from the previous assessment period. Improvements were noted in outage management, work planning, material condition, and preventive maintenance, to address weaknesses identified during the previous assessment period.

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Consumers Power Company

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Weaknesses were noted in the peer inspection program and interdepartmental communication and teamwork.

Overall performance in the area of Engineering improved from the previous assessment period. Progress had been made in addressing deficiencies noted in the previous assessment period. Communication and cooperation between engineering and other plant departments improved as a result of management initiatives, including the roving engineer and system engineer programs. These efforts resulted in more engineering involvement in plant problems than in the past and the development of a comprehensive preventive maintenance program. Weaknesses were noted in the review of operating experience reports and in the adequacy of engineering assessments.

Performance in the area of Plant Support was good. Management provided strong support toward maintaining good radiation protection, security and fire protection programs and excellent support towards the emergency preparedness and radiological environmental monitoring programs. This support was reflected in improved teamwork and work planning, and resulted in the lowest total collective dose since early in plant life and excellent implementation of the new 10 CFR Part 20 requirements. Challenges remain in controlling high radiation areas and contaminated material.

Your self-assessment program to identify and correct problems was weak in many cases. In most cases, issues were self-disclosing or identified by the NRC rather than being identified by your self-assessment process. Examples included foreign material exclusion concerns in containment and lessons learned from the Palisades control rod uncoupling event. Corrective actions on identified problems were mixed. In some cases, weak and narrow-scope root-causes were accepted, while in others, management used an excellent team approach to resolve the problem. Continued management attention is needed to improve your self-assessment process and develop consistently comprehensive corrective actions.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the SALP report will be placed in the NRC's Public Document Room.

Should you have any questions concerning the SALP report, we would be pleased to discuss them with you. While no written response is required, if you wish, you may provide written comments within 30 days of the SALP meeting.

Sincerely,

ORIGINAL SIGNED BY HUBERT J. MILLER

John B. Martin
Regional Administrator

Enclosure: SALP 12 Report
No. 50-155/94001

(see attached concurrence)

RIII Jackiw	RIII Phillips	RIII M.McB	RIII Kobetz	RIII LMiller	RIII LaTorre	RIII Greenman
RIII Crlenjak	RIII Axelson	NRR Marsh	RIII HMiller	RIII JMartin		

6/8/94

6/8/94

yes

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Your overall self-assessment program to identify and correct problems was considered inadequate. In most cases, issues were self-disclosing or identified by the NRC rather than being identified by your self-assessment process. Examples included foreign material exclusion concerns in containment and lessons learned from the Palisades control rod uncoupling event. Once issues were identified, corrective action approaches were mixed. In some cases, weak and narrow-scope root-causes were accepted, while in others, management used an excellent team approach to resolve the problem.

Important to continued improvement at Big Rock Point is successful implementation of an effective problem identification and assessment process. You have made some progress with respect to problem assessment; however, continued attention is needed to improve your problem identification process and develop consistently comprehensive root cause evaluations. We intend to closely follow your efforts in this important area.

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Regional Administrator

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See Attached Distribution

- RIII *[Signature]* RIII *[Signature]* [✓] RIII ¹² *[Signature]* RIII *[Signature]* RIII *[Signature]* RIII *[Signature]* RIII *[Signature]*
- Jackiw Phillips MCB Kobetzl LMiller LaTorre Greenman
- RIII RIII NRR RIII RIII
- Crlenjak Axelson Marsh HMiller JMartin

6/15/94

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copy

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RIII Crlenjak	RIII Axelson	RIII ^{Yes} Marsh <i>E-mail-5/31/94</i>	RIII HMiller	RIII JMartin		

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Nuclear Operations

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DRP Division Director, All Regions

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L. Cox, RIII

TSS, RIII

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

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