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Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - SALP 7 REPORT COMMENTS

Consumers Power Company appreciates NRC effort in assessing the performance of Big Rock Point during the SALP 7 period. Of special note was Mr. Paperiello and the SALP Board holding the presentation in Charlevoix, Michigan, which permitted an increased attendance of Consumers Power Company personnel responsible for the operation of Big Rock Point. The direct communication was a valuable part of the overall SALP process, and it will assist us in planning future strategies and activities to achieve excellence in performance.

Following the presentation and review of the SALP 7 Report, Consumers Power Company provides the following comments.

A. Plant Operations

No Comments.

B. Radiological Controls

Unresponsiveness to NRC initiatives and concerns for fuel inspections was never our intent. Only after carefully examining previous cycles' fuel failures, current indicators, and personnel doses was the decision made not to inspect fuel. We were confident that the fuel causing the failures was being discharged and not used in Cycle 22. In the spirit of ALARA, the possibility was great for receiving more dose from fuel inspections than the fuel failures we had been experiencing. Results of ultrasonic inspections and next cycle performance substantiated our original evaluation that all leaker bundles were discharged. Paragraph six (6) of this section incorrectly refers to "...gaseous releases...continued to be about a factor of 6 higher than normal." After the Cycle 22 Refueling Outage (March, 1987) gaseous release rate was restored to normal and currently no leaking fuel is evident.

It is true that a water chemistry control program based on BWR Owners Group Guidelines was not formalized, however, virtually every chemistry parameter is within these guidelines and we feel confident that plant management would take the appropriate measures if these parameters were above the

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> "action levels" of the guidelines even though they were not proceduralized. The applicable guidelines will be incorporated into plant procedures over the next procedure review cycle.

We note NRC concerns and have implemented improvements in the ALARA and Radiation Work Permit programs and frisking equipment/practices since the assessment, and will continue efforts to further reduce dose and contamination incidents.

C. Maintenance

Consumers Power Company utilized extensive resources in establishing a "good faith" effort in complying with the EEQ and Appendix R regulations. However, both the EEQ and Appendix R efforts evolved over a very long time period allowing program managers, both Consumers Power Company and NRC, to change during program development and compliance review. Decisions or compliance interpretations agreed upon at one stage have been changed or modified by individuals involved at later time periods. Consumers Power Company originally was involved in EEQ since 1975, with a LOCA task force, followed with the RDS Modifications, and with the Systematic Evaluation Program in the late seventies. Implementation Inspections did not commence until 1986. We believe this contributed to the EEQ issues dealing with MO-7068 and Polyethylene and Butyl rubber cables. Consumers Power Company still believes that MO-7068 and the cables were capable of performing their safety function, however, we agreed to replace the components rather than continuing to debate the issues.

Big Rock Point continues to have an effective maintenance performance history as evidenced by historical plant availability and number of forced outages. Reactor trips from power have been minimal and the plant material condition has been noted as very good by the NRC, INFO, and Insurance Inspectors. During this SALP period Big Rock Point initiated and recently completed a Maintenance Self-Assessment utilizing INPO guidelines. Throughout the next SALP period we will be implementing changes in our Maintenance Programs to improve the high priority areas identified in the self-assessment. These will further strengthen our maintenance performance.

In addition, several major pump and motor overhauls are planned for the upcoming refueling outage. The main feedwater pumps, turbine/generator, and a service water pump have been completed in the recent past. Over the next few years, two to three major pump overhauls per year are planned. Big Rock Point will continue to monitor equipment performance and industry maintenance practices toward enhancing existing Maintenance programs.

D. Surveillance

One inaccuracy existed in paragraph 3 of this section with regard to not performing a surveillance test (Service Test) on the station battery. A Technical Specification Change Request submittal dated December 22, 1986, which is still under NRR review, modified the Service Test design time interval to resolve errors as described in LER 86-004. Consumers Power

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Company agreed to implement this proposal into testing scheduled for the 1987 Refueling Outage. The modified surveillance test was completed satisfactorily during the outage.

E. Fire Protection

The NRC concern on lack of plant staff Appendix R understanding is related to the duration of the review and implementation. As discussed above in Section C, the effort extended over a long time period (approximately 1978-1986). Because of the long time interval the need existed for several technical-level meetings with staff and consultant personnel to review extensive submittals to understand the safe shutdown paths for Big Rock Point in complying with the Appendix R requirements. Although further NRR review was needed and one additional exemption was required, overall the post-fire safe shutdown methods met the requirements for Appendix R. Since the inspection, documentation has been improved and fire plans strengthened to enhance the capability of Big Rock Point to mitigate the effects of a plant fire.

F. Emergency Preparedness

No comments.

G. Security

In response to NRC concerns regarding equipment aging, the 1987 CCTV Upgrade Project was completed by year-end. Existing equipment was repaired, cleaned or replaced. Two additional CCTV cameras and new lights were installed and some existing lights were repositioned. A new metal detector and X-ray machine were purchased for installation in the Lobby of the Security Building.

In response to NRC concerns regarding an increase in personnel errors, several methods of monitoring personnel performance have been initiated in an effort to identify exceptional as well as weak performance. These methods allow trending errors and pinpointing the causes. Each First Lieutenant on shift is now committed to evaluating his shift personnel on a weekly basis and documenting the results on a "Personnel Evaluation Form." They are committed to one planned and one unplanned evaluation each week. Drills are conducted twice per month on each shift using adopted scenarios for contingencies. Individuals with recurring performance problems are retrained when needed and counseled or disciplined when applicable.

A new method of reviewing Logs has been established to track documentation errors. This will ensure that proper logging is being accomplished.

A full review of all site security manuals and routine job information sheets is being implemented to improve performance in the Security area.

H. Outages

No comments.

I. Quality Programs and Administrative Controls Affecting Quality

No comments.

J. Training and Qualification Effectiveness

Training and Qualification Effectiveness was evaluated as a category 2 - a rating judged equivalent in performance to the previous assessment period which at that time had received a category 1 rating. While we do not take issue with the lowering of a previously assessed category, a review of the training results completed during this SALP period leads us to conclude training warrants a category 1 assessment.

In response to the statement "While employees received some general worker training and on-the-job instruction, management made little progress in upgrading the mechanical/electrical staff's skill levels, a condition noted in the previous assessment period" on page 10 under maintenance summary; we believe that maintenance training has been aggressively pursued. We have doubled the training time per repairworker from SALP 6 to SALP 7. During the SALP 7 period, we provided 443 student days of Mechanical/Electrical skills training and 108 student days of Safety training. This is a significant investment of time dedicated for upgrading the skills of a maintenance staff of 14 repairmen. All of this instruction time was dedicated to strengthening the skills of our maintenance staff. This represents an investment of 13% of the repairmen's time for training.

We do not concur with the statement "Skill training that was scheduled during the assessment period was frequently cancelled because of plant activities..." on page 22 under the training summary. Our records indicate that there were no cancellations. There was some rescheduling of courses, but all courses originally scheduled were eventually completed. The percentage of courses required to be rescheduled was relatively low at 7.6% for the entire SALP 7 period, and was due to unforeseen plant outages.

Also, on page 22 of the training summary, further clarification is in order in response to the statement "Skill training and worker protection training was too general, not nuclear plant specific, and did little to enhance the effectiveness of the maintenance staff". Skills training is not always required to be nuclear plant specific, however during the period, 121 student days of Big Rock Point specific training was provided to the maintenance staff. It should also be noted that all of the tasks required of the Maintenance repairmen were addressed via classroom training, on-the-job training, and shop practices during the SALP 7 period. During the SALP 7 period, a major effort was made to modify training materials to assure that all tasks were addressed as identified on the Big Rock Point Plant Specific Task List. It is recognized that additional systems training is necessary for improved worker understanding and performance. At the end

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of the SALP period the second round of systems training was started for the least senior repairworkers at the plant.

Finally, on page 22, the statement "The Procedural requirements for both required and on-the-job training were not met and the Maintenance Department Training Program has not been evaluated and accredited by INPO" is somewhat misleading. INPO evaluation and accreditation was not planned to occur during this SALP period. The INPO evaluation was conducted in October 1987 and after the fourteen man team completed their evaluation they proposed zero recommendations in maintenance training. INPO considered the program to be very good and stated our program demonstrated a strong commitment by the plant. Essentially all of the procedural requirements for classroom and OJT were complete and in place prior to the end of the SALP 7 period. Formal INPO Board approval is tentatively scheduled to occur in the first quarter 1988.

We also reiterate the fact that initial or replacement license candidate and requalification license candidate classes both achieved a 100% pass rate during the SALP period. This is the sixth license class to achieve a 100% pass rate. It is a record we are very proud of and speaks for itself as to the caliber of Big Rock Point training.

We believe the above results demonstrate that management commitment to training is evident to assure that our training provides the skills and knowledge necessary to continue to operate Big Rock Point as a safe and -eliable plant. We also believe that the training results completed during the SALP 7 period supports a Category 1 assessment.

K. Licensing Activities

Consumers Power Company Management and staff will continue to support and utilize the Integrated Living Schedule (ILS) in accordance with License requirements to evaluate and prioritize workload. We also plan on working with Region III personnel in the near term, on exploring ways to use the ILS process in prioritizing inspection based plant betterments.

Consumers Power Company understands that high quality and timely licensing documents are essential in maintaining a sound licensing basis for Big Rock Point and continue to support this objective. Corporate and plant licensing personnel will continue to advocate frequent meetings with NRR and Region personnel to understand and prioritize issues from both a NRC and Consumers Power Company perspective. Our goal will be to recognize unique or complex technical issues and ensure that related submittals are timely with sufficient detail to minimize interaction.

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Consumers Power Company believes the overall SALP evaluation presented a balanced assessment of plant performance during the appraisal period. The issue concerning resource allocation that was raised in the SALP report is one to which we will remain sensitive, but Consumers Power Company strongly believes that management commitment to excellence cannot be measured by the amount of money spent on a plant. We will continue to work closely with the NRC staff in communicating the establishment of priorities and schedules for action to improve plant safety and performance.

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