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

William L. Beckman
Plant Manager

February 4, 1993

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
LICENSEE EVENT REPORT 93-001: FAILURE TO POST HIGH RADIATION AREA PURSUANT TO
PLANT TECHNICAL SPECIFICATIONS

Licensee Event Report (LER) 93-001, Failure to Post High Radiation Areas
Pursuant to Plant Technical Specifications, is attached. This event is
reportable to the Nuclear Regulatory Commission per 10 CFR 50.73(a)(2)(i)
paragraph (B).

William L. Beckman
Plant Manager

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

ATTACHMENT

120067

9302120259 930204
PDR ADOCK 05000155
S PDR

A CMS ENERGY COMPANY

JE28 1/1

LICENSEE EVENT REPORT (LER)

| | | | |
|----------------------|--|-------------------|----------|
| FACILITY NAME (1) | | DOCKET NUMBER (2) | PAGE (3) |
| BIG ROCK POINT PLANT | | 0 5 0 0 0 1 5 5 | 1 OF 0 3 |

TITLE (4) FAILURE TO POST HIGH RADIATION AREA PURSUANT TO PLANT TECHNICAL SPECIFICATIONS

| EVENT DATE (5) | | | LER NUMBER (6) | | REPORT DATE (8) | | | OTHER FACILITIES INVOLVED (9) | |
|----------------|-----|------|----------------|-------------------|-----------------|-------|-----|-------------------------------|-------------------------|
| MONTH | DAY | YEAR | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | MONTH | DAY | YEAR | FACILITY NAMES |
| 0 | 1 | 0 | 9 | 9 | 3 | 9 | 3 | - | 0 0 1 - 0 0 0 2 0 4 9 3 |
| | | | | | | | | | N/A |
| | | | | | | | | | N/A |

| | | | | | | | | | | |
|---------------------|---|---|-------------------------------------------------------------------------------------------------------------|-----------------|----------------|--------------------|-----------------------------------------------|--|--|--|
| OPERATING MODE (10) | | N | THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 1. Check one or more of the following: (11) | | | | | | | |
| POWER LEVEL (10) | 0 | 9 | 3 | 20.402(b) | 20.406(a) | 60.73(a)(2)(iv) | 73.71(b) | | | |
| | | | | 20.406(a)(1)(b) | 60.73(a)(1) | 60.73(a)(2)(iv) | 73.71(c) | | | |
| | | | | 20.406(a)(1)(c) | 60.73(a)(2) | 60.73(a)(2)(iv) | OTHER (Specify in Abstract below and in Text) | | | |
| | | | | 20.406(a)(1)(d) | 60.73(a)(2)(b) | 60.73(a)(2)(iv)(A) | NRC Form 388A | | | |
| | | | | 20.406(a)(1)(e) | 60.73(a)(2)(b) | 60.73(a)(2)(iv)(B) | | | | |
| | | | | 20.406(a)(1)(f) | 60.73(a)(2)(b) | 60.73(a)(2)(iv) | | | | |

LICENSEE CONTACT FOR THIS LER (12)

| | |
|-----------------------------------------|---------------------------------|
| NAME | TELEPHONE NUMBER |
| MICHAEL D BOURASSA, SENIOR TECHNOLOGIST | AREA CODE 0 1 6 5 4 7 - 6 5 3 7 |

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRC | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRC |
|-------|--------|-----------|--------------|-------------------|-------|--------|-----------|--------------|-------------------|
| A | N | A | - | - | - | - | - | - | N |

SUPPLEMENTAL REPORT EXPECTED (14)

| | | | | | |
|----------------------------------------------|----|-------------------------------|-------|-----|------|
| YES If you complete EXPECTED SUBMISSION DATE | NO | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
| X | | | | | |

ABSTRACT Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines (16)

Big Rock Technical Specification 6.12.1 requires that: "...each high radiation area in which the intensity of radiation is less than 1000 mR/h at 45 cm (18 in) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area (HRA)..."

On January 11, 1993, a reviewer observed that dose rates on a vacuum filter unit located on the reactor deck measured 3.9 Rem/hr contact and 500 mRem/hr at twelve inches as of a January 9, 1993 survey. The sheet did not, however, document that the area had been posted as an HRA.

The cognizant technician believed the reactor deck to be a high radiation area; further posting of the filter unit was not required. On January 11, 1993 the filter unit was immediately barricaded and shielded. The status sheet was updated to reflect current conditions.

The event has been discussed at the Chemistry/Health Physics weekly meeting. Actions will also be taken to prevent the unit from becoming an HRA. No dose limits were exceeded.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (3) | | | PAGE (3) | | |
|------------------------------|-------------------|----------------|-------------------|-----------------|----------|----|-----|
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
| BIG ROCK POINT NUCLEAR PLANT | 0 5 0 0 0 1 5 5 | 9 3 | 0 0 1 | 0 0 | 0 2 | OF | 0 3 |

TEXT IF more space is required, use additional NRC Form 266A 3/ (17)

DISCUSSION OF EVENT

Big Rock Technical Specification 6.12.1 requires that: "...each high radiation area in which the intensity of radiation is less than 1000 mR/h at 45 cm (18 in) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area (HRA)..."

During a review of radiological status sheets on January 11, 1993, prepared for January 9 and 10, 1993, the reviewer observed that dose rates on the spent fuel pool (DA) vacuum filter (FLT) unit located on the reactor (RCT) deck measured 3.9 Rem/hr contact and 500 mRem/hr at twelve (12) inches. The sheet did not, however, document that the area had been posted as an HRA as required by the Technical Specification.

CAUSE OF THE EVENT

When interviewed, the cognizant Radiation Safety technician believed the reactor deck to be a high radiation area, and since it was already posted as such, further posting of the vacuum filter unit was not required.

CORRECTIVE ACTION TAKEN

On January 11, 1993 @ 0830 a Radiation Safety technician was dispatched to the reactor deck to survey the area and insure that postings were appropriate. The technician noted that the area in question had not been posted as required. The area was immediately barricaded using rope, the vacuum filter (FLT) unit was shielded to lower dose rates, and the status sheet was updated to reflect current conditions.

ACTION TAKEN TO PREVENT RECURRENCE

The event has been discussed at the Chemistry/Health Physics weekly meeting as to how to prevent recurrence. In addition, the event, and it's relationship to posting requirements and section 6.12.1 of the plant Technical Specification will be covered in continuing training.

The current operation of the vacuum filter unit for spent fuel pool vacuuming will also be evaluated. Actions taken to prevent the unit from becoming an HRA (shielding, alarming monitor (MON), etc) will be investigated for implementation.

SAFETY SIGNIFICANCE

Even though the vacuum filter unit was not posted as an HRA as required, the Radiation Safety technician took action when he became aware of the elevated dose rates (such as notifying the shift supervisor that any additional work on

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
| | | 0 5 0 0 0 1 5 5 | 9 3 | 0 0 1 | 0 0 | 0 3 | OF 0 3 |

TEXT (If more space is required, use additional NRC Form 255a w/ (17))

SAFETY SIGNIFICANCE (Continued)

the reactor deck be conducted as far from the vacuum filter unit as possible) that were in the best interest of radiation workers. The Auxiliary Operators (AOs) working in the area were well aware of general area dose rates and made use of their radiation protection instrumentation at all times. Most of the work performed in the area between January 9 and 11, 1993, was performed from the mechanized bridge (CRN) over the fuel pool, some distance from the vacuum filter unit. No dose limits were exceeded.