



Consumers  
Power

**POWERING  
MICHIGAN'S PROGRESS**

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

William L. Beckman  
Plant Manager

February 17, 1993

Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -  
UPDATE TO LER 92-008 AND REPLY TO NOTICE OF VIOLATION (NRC INSPECTION REPORT  
50-155/92017)

The subject LER and associated violation response dated November 24, 1992  
included the following action to prevent recurrence:

"Review the equipment tagging section of the System Operating  
Procedures (Section 7.0) and the Master Switching and Tagging  
Orders. Make revisions, as required, to include the limiting  
conditions and necessary cautions for operation when equipment  
is removed from service. This action will be completed by  
December 31, 1992."

A review of the equipment tagging Section 7.0 for the SOP's was performed.  
The limiting conditions and cautions, although not all inclusive were stated  
correctly. When not included in Section 7.0, appropriate guidance was given  
in Section 2.2 (Plant Requirements) or Section 3.0 (Precautions and  
Limitations) of the respective SOP.

The Master Switching and Tagging Orders were also reviewed, and in general  
they do not provide cautions or limiting conditions for operation. There was  
not a Master Switching and Tagging Order for the station battery chargers.

Following completion of this investigation, Consumers Power Company has  
changed the action to prevent recurrence to revising the Administrative  
Procedure discussing plant status and equipment control versus the SOP's and  
Master Switching and Tagging Orders for the following reasons:

- 1) Sections 2.2, 3.0 and 7.0 currently provide appropriate guidance  
concerning limiting conditions and cautions.

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NUCLEAR REGULATORY COMMISSION  
BIG-ROCK POINT PLANT  
UPDATE TO LER 92-008/IR 92-017 VIOLATION  
February 17, 1993

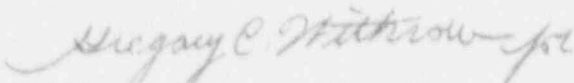
- 2) Section 7.0 of the SOP's provides guidance for determining the proper tagging points, however based upon the work scope, need to be modified at times. Also, tagging orders are sometimes developed without utilizing Section 7.0 of the SOP's or the Master Switching and Tagging Orders.
- 3) Determining the necessary limiting conditions and cautions when portions of equipment or support systems are removed from service is subjective and requires investigation prior to removal from service. Procedural requirements applicable at all times is difficult to provide in these cases.

Based upon the above, the following actions will be taken:

- Plant Administrative Procedure 2.1.4, "Plant Status and Equipment Control" (Section 5.6, Personal Protective Tags), will be revised to provide specific guidance for determining the limiting conditions and cautions prior to removing equipment from service. This would provide guidelines for removing all equipment from service whether or not the activity is covered in Section 7.0 of an SOP or a Master Switching and Tagging Order.
- Following completion of the above change, the guidelines will be reviewed by all Operations Department personnel.

The change along with review by Operations personnel will be completed by June 1, 1993.

During a review of our actions in response to this Violation, BRP personnel identified that corrective actions discussed above had not been completed by the December 31, 1992 date. This occurred because the Shift Supervisor assigned the actions concluded that the changes as proposed were not appropriate and was awaiting concurrence with this position by the Operations Superintendent. We recognize that you should have been informed of this change prior to the December 31, 1992 date and have discussed this error with the individuals involved. The Resident Inspector has been informed of this missed commitment date.



William L. Beckman (Signed)

William L. Beckman  
Plant Manager

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