



Consumers
Power
Company

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May 31, 1985

Director,
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
CONTROL ROOM DESIGN REVIEW SCHEDULE UPDATE - INTEGRATED PLAN ISSUE 5

Consumers Power Company letter of February 12, 1985 identified a delay in completion of the Big Rock Point Integrated Plan Issue 5, Control Room Design Review. The projected completion date stated in that letter was October 31, 1985. Since that time, there has been a change in the Issue Manager for the project, of which we have notified our NRC Project Manager. With this change in personnel it has been necessary to re-evaluate and reschedule the activities associated with the project resulting in the attached revised schedule (rev. 4, 5/10/85). Based on the projected review and approvals of the final summary report Consumers Power Company would expect to submit the report by April 15, 1986.

During the Issue Manager transition period progress continued on completion of the Symptom Action Sets and drawings for panel demarcation and labeling changes which were already underway.

The walk-throughs (Activity Number 10) are presently scheduled to start about September 1, 1985, however due to refueling outage activities constraints on operators availability may affect start of the walk through. Our NRC Project Manager has informed us that the NRC proposes to conduct an audit of our program during these walk-throughs. Consumers Power Company will maintain contact with the NRC to help support your needs for this audit.

On March 20, 1985 a conference call between members of the NRC staff and their consultants and members of Consumers Power Company staff discussed the control room design review program. A memorandum, with the meeting minutes attached, was issued to the Operating Reactors Branch No. 5 Chief from the NRC Project Manager, on April 11, 1985. The memorandum contained information that did not reflect our position. The following point has been discussed with the Project Manager and is:

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Director, Nuclear Reactor Regulation
Big Rock Point Plant
CRD Review Schedule Update
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Page 1 bullet 1; "The licensee stated that an outside human factors expert would be contracted." (underlining added). Our position is we may contract a human factors consultant as recommended by the NRC, however it is our belief that a successful control room design review can be conducted without the use of a consultant. We base this belief on the relatively small and simplistic control room at Big Rock Point and the experienced staff conducting the review. Although there has been some turnover in personnel we still maintain it may not be necessary to contract a human factors consultant.


James L. Kuemin
Staff Licensing Engineer

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

Attachment

ATTACHMENT

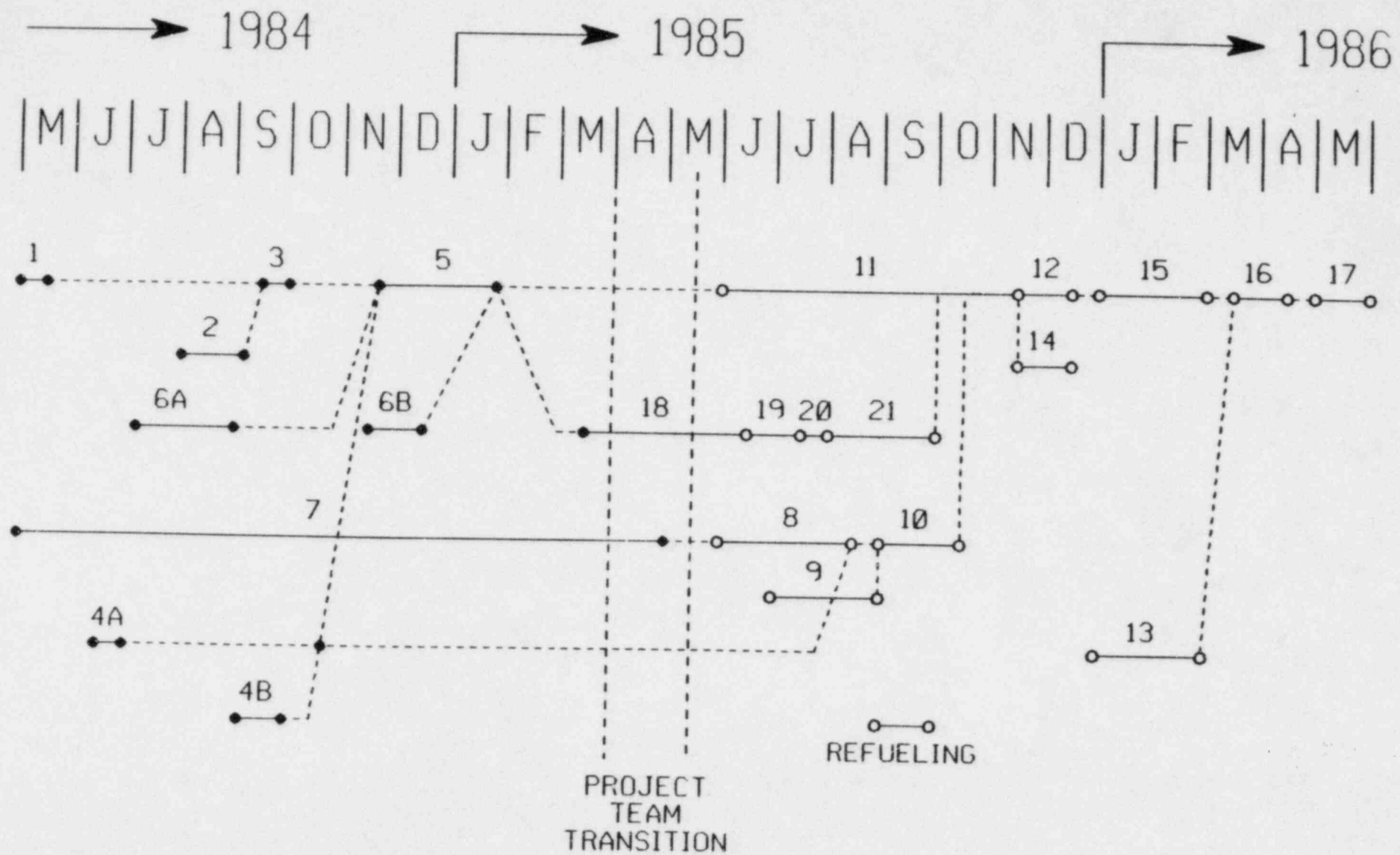
Consumers Power Company
Big Rock Point Plant
Docket 50-155

CRDR PROGRAM SCHEDULE

May 31, 1985

3 Pages

CRDR PROGRAM SCHEDULE



BRP CRDR
PROGRAM SCHEDULE
REV 4 5/10/85

BIG ROCK POINT
CRDR PROGRAM SCHEDULE
(Rev 4, 5/10/85)

<u>Activity Number</u>	<u>Activity Description</u>	<u>Activity Status</u>
1	Historical Data Review	Completed
2	Operating Experience Questionnaire	Completed
3	Follow up Interviews	Completed
4A	Engineering Dept. Questionnaire	Completed
4B	Operating Survey Questionnaire	Completed
5	Survey Checklists	Completed
6A	Design Convention Surveys	Completed
6B	Measurement Surveys	Completed
7	Symptom Action Sets	Completed
8	Task Identification Develop form, define accident sequences from OAET by defining inputs, throughputs and outputs by which actions are implemented (No HED's)	6/1/85
9	Verification of I&C Develop form, based on activity 8 results - inventory control room to assure existence of instruments and controls, cross check prior HED's for conflicts, record new HED's	7/1/85
10	Walk Throughs Develop forms (inc. summary form) conduct walk- throughs based on those required by NUREG 0700 (3.8.2) using scenarios as described in the OAET. Validate task identification analysis and I&C verification analysis results. Interview operators regarding layout, arrangement and design, information for HED classification input.	9/1/85

Activity Number	Activity Description	Activity Status
11	Assessment of HED's Compile HED summary, write up prior identified HED's, review and/or modify methodology to categorize HED's, photograph each HED, develop photograph management system. Categorize HED's (on going).	6/1/85
12	Proposed HED Corrective Action Proposed corrective action logged on HED form. Resolution can be in form of paint, tape and label (static), backfitting (which may include SPDS), procedures changes and training. Request CRMP perform PRA cost benefit. Analysis on major HED's. Submit summary of proposed resolutions to TRG for further assessment and ranking within plant priorities.	11/15/85
13	Develop ongoing HED Program Establish procedure to use in future projects incorporate requirements in appropriate plant documents assuring compliance (FC, SC, SPC, etc).	
14	Develop SPDS Justification Utilize relevant data extracted from appropriate documents to develop justification (for or against). Sources: Operator interviews, walkthroughs, HED's. Write justification, submit for review to TRG and incorporate into final report.	11/15/85
15	Compile Documentation & Draft Final Report	1/1/86
16	Final Report Review and Comment Submit to NRC	3/15/86 4/15/86
17	Project Close Out	5/1/86
18	Prepare Panel Drawings CAD panel drawings, include demarcation and labels, add to panel drawing series, revise nameplate list. Compare with HED's.	3/15/86
19	Review Panel Drawings Submit to team members and plant for review, discuss with operators.	6/15/85
20	Revise panel Drawings Based on feedback change drawings.	7/15/85
21	Implement Arrange for label and material to place static changes on panels. Determine who, how and when. Verify completed per drawings. Implementation will be through use of BRP - FC or SC.	8/1/85