

NOTICE OF VIOLATION

Consumers Power Company
Big Rock Point Nuclear Plant

Docket No. 50-155
License No. DPR-06

During an NRC inspection completed on December 6, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

Big Rock Point Technical Specification (TS) No. 6.11 requires that procedures for radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20, and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

Big Rock Point Procedure No. RP-30, "Establishing Area Postings" (Rev. No. 12), step 5.3.2 required that high radiation areas be conspicuously posted with a standard magenta radiation symbol on a yellow background with the words "CAUTION, HIGH RADIATION AREA," and Step 5.7.2 required that areas having contamination in excess of 1,000 disintegrations per minute per 100 square centimeters of activity (beta/gamma) be conspicuously posted with a standard magenta radiation symbol on a yellow background with the words "CAUTION, CONTAMINATED AREA."

Big Rock Point Administrative Procedure No. 5.11, "Radioactive Material Control" (Rev. No. 13), Step 5.4.3.1 required that all containers of radioactive material be labeled with a visible label bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL." The label and container shall provide sufficient information to permit individuals handling, using, or working near the containers to take precautions to minimize exposure.

Big Rock Point Procedure No. RM-56, "Radiological Clearance for Off-site Removal of Material" (Rev. No. 14), Step 5.7 required that all material having "clean" status (can be released for unrestricted use) shall have no activity detected by either a direct frisk, as measured with a frisker or a pancake probe, or shall successfully pass through contamination monitors.

Contrary to the above:

- a. On December 3, 1996, the resin shed, a high radiation area with a radiation dose rate of approximately 100 millirem in one hour at 30 centimeters from the radiation source and a contaminated area with non-fixed contamination of approximately 30,000 disintegrations per minute per 100 square centimeters of activity (beta/gamma), was not posted with signs bearing the radiation symbol and the words, "CAUTION, HIGH RADIATION AREA" and "CAUTION, CONTAMINATED AREA."

- b. On December 3, 1996, the labels on 6 boxes of dry active waste stored in the radwaste storage building did not provide sufficient information to individuals handling, using, or working near the containers to take precautions to minimize exposure. Specifically, the labels indicated that contact dose rates were less than 5 millirem per hour; however, contact dose rates were actually between 20 and 40 millirem per hour on 4 boxes and between 100 and 120 millirem per hour on 2 boxes.
- c. On October 4, 1996, a truck which had been released for unrestricted use subsequently had activity detected of approximately 20,000 disintegration per minute per 100 square centimeters as measured with a frisker.

This is considered a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Consumers Power Company is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the Big Rock Point facility, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Lisle, Illinois
this 02 day of January 1997