U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-155/85013

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

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49102

Facility Name: Big Rock Point Nuclear Plant

Inspection At: Charlevoix, MI

Inspection Conducted: July 15-18, 1985

Inspector: T. E. Taylor 8-7-85
Date

Approved By: F. Hawkins, Chief
Quality Assurance Programs Section 8/7/85
Date

Inspection Summary

Inspection on July 15-18, 1985 (Report No. 50-155/85013(DRS))
Areas Inspected: Routine announced inspection relative to the implementation of Generic Letter (GL) 83-28 in the areas of equipment classification, vendor interface, post-maintenance testing, reactor trip system reliability, and post-trip review. The inspection involved a total of 28 inspector-hours onsite by one NRC inspector.
Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

Consumers Power Company

*D. P. Hoffman, Plant Superintendent
*L. Monshor, QA Superintendent
*R. J. Alexander, Technical Engineer
*G. H. R. Petitjean, Technical Superintendent
*W. J. Trubilowicz, Acting Operations Superintendent
*G. C. Withrow, Maintenance Superintendent
*J. A. Johnson, Instrument and Control Supervisor
D. Wilks, Maintenance Supervisor
R. May, Shift Supervisor

USNRC

S. Guthrie, Senior Resident Inspector

In addition, a number of other plant personnel were contacted.

*Denotes those present at the exit interview on July 18, 1985.

2. Equipment Classification

Through review of procedures, discussions with licensee personnel, and review of records, the inspector determined that the licensee's programs for equipment classification, with the exception of one unresolved and one open item, met the requirements of Generic Letter 83-28, Sections 2.1 and 2.2.

For equipment classifications, the licensee has two references: an equipment list which is accessed using a computer terminal and the Big Rock Point Plant Manual Quality List (Volume 17). Volume 17 contains a printed quality list (Q-list) and the procedures used for equipment classifications. Several licensee personnel were interviewed and stated that the Volume 17 Q-list is used most often for equipment classification information. During this inspection, one concern was identified relative to the Volume 17 Q-list. Specifically, there is presently a delay processing changes to the Volume 17 Q-list. Because of this delay, the inspector is concerned that the Q-list does not accurately reflect equipment classifications and could result in the use of misclassified equipment. This item is considered unresolved pending further NRC review (50-155/85013-01).

The inspector also reviewed the methods used by the licensee for review and evaluation of safety-related equipment rework activities. The licensee had performed informal rework activity analyses for safety-related equipment on December 13, 1984 (mechanical and electrical) and May 30, 1985 (for instrumentation). The licensee has agreed to formalize this activity using administrative procedures which will include determining the root cause of equipment malfunction, recommending corrective action, and ensuring corrective action is accomplished. This is considered an open item pending implementation of the administrative controls (50-155/85013-02).

3. Vendor Interface

Through review of procedures and discussions with licensee personnel, the inspector determined that the majority of the licensee's vendor interface programs are being revised to comply with Sections 2.1 and 2.2 of GL 83-28. Additionally, the licensee is in the process of implementing procedure 20.09 ("Vendor Equipment Technical Information Program") which establishes the control, revision, and distribution of plant vendor technical information. A list of vendor contacts and a User Index which provides a cross reference system for equipment identification numbers, plant systems, and applicable maintenance procedures are also being developed. Pending implementation of the procedures, the User Index, and the vendor contact list, this matter is considered open (50-155/85013-03).

No violations or deviations were identified.

4. Post-Maintenance Testing

Through discussions with licensee personnel, review of administrative procedures and review of completed work orders, the inspector determined that the licensee's programs for post-maintenance testing is in compliance with the requirements of GL 83-28, Sections 3.1 and 3.2.

The licensee's administrative controls for work orders and post-maintenance testing are addressed in Administrative Procedures Volume 1, Chapter 5 ("Maintenance Department Administrative Procedures"). For post-maintenance testing requirements, the licensee uses work orders (WO), equipment outage requests (EORs), instrument check sheets, and replacement/repair procedures. Upon completion of testing, operations personnel review the results and if satisfactory declare the equipment operable. The inspector was concerned with the frequent lack of detail of the instructions and documentation of the post-maintenance testing when the WO's and EOR's are used. This item was discussed with licensee personnel and is considered unresolved pending further NRC review (50-155/85013-04).

No violations or deviations were identified.

5. Reactor Trip System Reliability

Through review of surveillance procedures, test records and discussions with licensee personnel, the inspector determined that the licensee is in compliance with the requirements of GL 83-28, Section 4.5.1.

The licensee uses a manual schedule and tracking system to control the surveillane program. Weekly and monthly surveillances are performed using switches which test both the A and B trip logic channels. These tests initiate a half scram condition which test both the initiating circuits and the scram solenoid for the trip channel being tested. Procedure T7-04 ("Weekly Reactor Protection Log System Test") describes the process used to test the high pressure trip for both trip channels and procedure T30-01 ("Monthly Reactor Protection System Test At Power") describes the process used to test all the reactor trips for both channels. Also, on a refueling cycle frequency, the instrument and control department performs procedure TR-32 ("Reactor Protection System Scram Sensors Test"). This procedure

outlines the process used to initiate a scram signal using the installed plant instrumentation.

No violations or deviations were identified.

6. Post Trip Review

Through review of procedures, discussions with licensee personnel, and review of completed reactor trip reports, the inspector determined that the licensee's program for post trip review met the requirements of GL-83-28, Section 1.2 concerning review and evaluation of unscheduled reactor trips.

The licensee's review and evaluation of unscheduled reactor trips is controlled by Administrative Procedures Volume 1, Chapter 4, Attachment C ("Reactor Trip Report"). The reactor trip report documents the cause of the trip, verifies proper operation of safety-related equipment, verifies that the trip event did not have any detrimental effect on the plant, and that anomalies are corrected prior to returning the reactor to power operations.

No violations or deviations were identified.

7. Open Items

Open items are matters which have been discussed with the licensee, which will be reviewed further by the inspector, and which involved some action on the part of the NRC or licensee or both. Open items disclosed during the inspection are discussed in Paragraphs 2 and 3.

8. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, violations, or deviations. Two unresolved items disclosed during the inspection are discussed in Paragraphs 2 and 4.

9. Exit Interview

The inspector met with licensee representatives listed in Paragraph 1 on July 18, 1985, and summarized the scope and findings of the inspection. The inspector discussed the likely informational content of the inspection report with regard to documents or processes reviewed by the inspector during the inspection. The licensee did not identify any such documents or processes as proprietary.