

## NOTICE OF VIOLATION

Consumers Power Company  
Big Rock Point Nuclear Plant

Docket No. 50-155  
License No. DPR-6

During an NRC inspection conducted from October 19, 1996, through November 29, 1996, five examples of violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the examples are listed below:

1. Technical specification (TS) 6.8.1 requires that written procedures be established, implemented, and maintained for all structures, systems, components, and safety actions defined in the Big Rock Point Quality List. These procedures shall meet or exceed the requirements of ANSI N18.7, as endorsed by CPC-2A, "Quality Program Description for Operational Nuclear Power Plants."

CPC-2A, Section 5.2 states, in part, that system operating procedures (SOPs) are used to control activities affecting the quality of safety related structures, systems, and components.

SOP 6, Volume 3, "Emergency Condenser System," Revision 154, Step 2.2.b states, "If one loop of the emergency condenser becomes inoperable, an operability test of the outlet valve on the other loop must be successfully completed within 1 hour."

Contrary to the above, on November 8, 1996, operators closed the emergency condenser (EC) No. 1 loop inlet valve (MO-7062), making the No. 1 EC loop inoperable, but an operability test of the No. 2 EC loop outlet valve was not performed within 1 hour.

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

2. 10 CFR 50, Appendix B, Criterion V, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS," requires, in part, that instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been accomplished.

Contrary to the above, procedure O-VAS-1, "Cold/Warm Weather Checklists," revision 18, did not include appropriate acceptance criteria for determining whether work requests containing modifications or repairs required to prevent freezing of plant safety related components had been accomplished.

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

3. Technical Specification 11.4.1.5, "Surveillance Requirements," requires, in part, that the Reactor Depressurization System Input Channels A through D shall be instrument trip tested monthly (when the unit is Operating).

Technical Specification 1.1.4 requires, in part, that surveillances shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified interval.

Contrary to the above, from March 11 through May 11, 1994, with the unit operating, the Reactor Depressurization System Input Channel C surveillance was not performed within the specified interval and allowable extension period.

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

4. Technical Specification 6.11, "Radiation Protection Program," requires, in part, that procedures for personnel radiation protection shall be adhered to for all operations involving personnel radiation exposure.

Administrative Procedure 5.5, "Radiation Work Permit," Revision 12, requires, in part, that workers not unnecessarily contact contaminated surfaces with their body, tools or equipment, and not disturb such surfaces to spread contamination.

Contrary to the above, on August 5, 1996, two workers unnecessarily spread contamination on themselves and previously uncontaminated portions of the plant.

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

5. Technical Specification 12.3.7.12, requires, in part, that with one or more of the fire barriers non-functional, a fire watch patrol shall be established within one hour and the affected areas shall be inspected at least once per hour.

Contrary to the above, on August 5, 1996, a fire barrier was rendered non-functional, but a fire watch patrol was not established within one hour and the affected area was not inspected at least once per hour.

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

Pursuant to the provisions of 10 CFR 2.201, Consumers Power Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region III, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, 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 29th day of January 1997