



**Consumers
Power
Company**

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August 30, 1985

James G Keppler, Administrator
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
RESPONSE TO IE INSPECTION REPORT 85-10

Inspection Report 50-155/85-10 dated August 1, 1985 did not identify any items of noncompliance. However, one unresolved item, No. 155/85010-03, resulting in three recommendations requiring a response was identified. The following is Consumers Power Company's response to the concerns.

Unresolved Item 155/85010-03

The inspector noted that in some cases revised Nuclear Operations Department Standards (NODS) referenced a cancelled NODS. In one case the reference was a "use" reference: NODS-Q01, ("Corrective Action and Nonconforming Items") was revised to require QA Support to trend certain items in accordance with NODS-M05 ("Supplier Evaluation and Selection") which had been cancelled. The inspector asked whether the requirements of the cancelled NODS were included in either the remaining NODS or the Administrative Procedures (APs). Licensee personnel stated that the situation had been reviewed and they were satisfied that all requirements of the cancelled NODS were addressed; however, they recognized that cancelled NODS were still referenced in both the APs and active NODS and could not ensure that there were no other cases in which the reference was a "use" reference. The licensee's current plan was to delete references to the cancelled NODS in the APs or NODS when they were revised for other reasons or at the time of their biennial review. The inspector was concerned that in the case where the reference was a "use" reference, as in the case noted above, this schedule could lead to the use of uncontrolled documents (cancelled NODS) or the lack of specific direction for performing safety related activities.

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NRC recommendations resulting from unresolved item 155/85010-03 and our response to the same are as follows:

NRC Concern

1. The licensee should perform an immediate and in depth review to identify any case where a cancelled NODS is required as a "use" reference. In those cases, immediate corrective action should be taken.

Response

To date, all NOD Standards have been thoroughly reviewed for references to cancelled NODS. As of August 8, 1985, all sponsors of those NODS identified above have been contacted both verbally and by memo to delete the obsolete references and to revise their standards accordingly within 30 days. Upon approval of the resultant changes (anticipated to be prior to November 1, 1985), subsequent notices will be sent to all departments/plants to delete the noted references from all department/administrative procedures.

The necessary revisions to remaining NODS which may have been impacted by the addition of QA Program requirements from cancelled NODS, and a verification that the Big Rock Point Plant APs include the QA Program requirements of cancelled NODS, will be completed by January 1, 1986.

NRC Concern

2. The revision to the Quality Assurance Requirements Matrix (QARM) should be given a high priority.

Response

As indicated in discussions with the members of your staff, Consumers Power believes that the QA Program requirements contained in the cancelled NOD Standards are, and continue to be, addressed in the appropriate Big Rock Point APs. However, to provide additional assurance that this is so, the following actions have been or will be taken:

1. The QARM data for each cancelled NODS will be reviewed by October 1, 1985 and the requirements re-indexed, either to another NODS, or the APs.
2. A review will be made of the Big Rock Point APs relative to the QA Program requirements identified from the cancelled NODS, to specifically identify the AP which satisfies each of these requirements. This data will be included in the QARM which will be revised by January 1, 1986.

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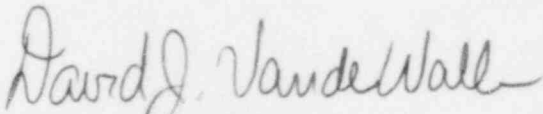
NRC Concern

3. The licensee's audit and trending programs should be augmented on a temporary basis to focus on these changes to determine if they have impacted the safety of facility operation.

Response

Each Lead Auditor has been instructed to pay particular attention to deleted NOD Standards as they relate to assigned audit subject matter. The audit teams will verify the inclusion of necessary program requirements in other program documents (ie, Plant Admins, other NODS). This review will be done on a sample basis during the normal cycle of audits for each scheduled audit impacted by a deleted NOD.

These described actions will provide assurance that QA requirements will continue to be properly addressed within the system for administrative controls. In addition to the responses provided here, we would like to discuss these subjects as well as other observations specified in the Inspection Report with representatives of your staff at the NRC Region III office on October 1, 1985 or after at your earliest convenience.



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Director, Nuclear Licensing

CC Director, Office of Nuclear Reactor Regulation
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NRC Resident Inspector - Big Rock Point