



**Consumers
Power
Company**

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

December 4, 1985

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

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
PROPOSED OPERATING LICENSE CHANGE REQUEST -
INTEGRATED ASSESSMENT, SUPPLEMENTAL INFORMATION

Consumers Power Company letter dated June 7, 1985, as modified by our September 3, 1985 letter submitted a proposed license change request to incorporate the "Plan for the Big Rock Point Integrated Assessment" into Big Rock Point's operating license. This submittal provides supplemental information to address NRC concerns raised during preliminary staff review.

Attached is a revised "Plan for the Big Rock Point Integrated Assessment" which contains changes made to resolve preliminary staff concerns. These changes have been previously discussed and agreed upon between respective members of our staffs and are intended to minimize vagueness and to provide clarification within the Plan.

Pursuant to 10CFR170.12(c) a check in the amount of \$150.00 was attached to our June 7, 1985 submittal, hence no fee is remitted with this submittal.

Ralph R Frisch
Senior Licensing Analyst

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

Attachment

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OC1185-0345-NL04

ATTACHMENT

Consumers Power Company
Big Rock Point Plant
Docket 50-155

REVISED PLAN FOR THE BIG ROCK POINT
INTEGRATED ASSESSMENT

December 4, 1985

PLAN FOR THE BIG ROCK POINT INTEGRATED ASSESSMENT

I. INTRODUCTION

Consumers Power Company (CPC) has developed a comprehensive program which will enable the Company to effectively manage implementation of significant changes to our Big Rock Point Plant which have been required, or proposed by, the NRC, as well as other measures to enhance plant safety and reliability which have been identified by the Company or other agencies (eg, the Institute of Nuclear Power Operations). A description of the program, identified as the "Integrated Assessment of Open Issues and Schedule for Issue Resolution (Including Environmental Equipment Qualification and Generic Letter 82-33 Issues)" was submitted to the NRC by our letter dated June 1, 1983. The term Issue Resolution as used herein refers to the actions necessary to resolve concerns (safety related or otherwise) which have been identified by the NRC or CPC. This may include analyses, studies and/or plant modifications.

This program was developed to assess, coordinate and schedule all necessary work at the Big Rock Point Plant, including those mandated or proposed by the NRC, or identified by CPC and others. The program objectives are to (1) satisfy regulatory requirements; (2) provide sufficient lead times for modifications; (3) minimize changes for operators; (4) effectively manage financial and human resources; and (5) specify the framework for changes to developed issue resolutions and associated schedules. This will be accomplished within the overall objective of plant safety and availability.

This program reflects the recognition by CPC and the NRC that fiscal and manpower resources are finite and that a limit on the onsite manpower is necessary. The program integrates a significant portion of presently planned work at the Big Rock Point Plant over a nominal three-year period to ensure that individual issues are properly assessed and that the tasks associated with issue resolution are effectively scheduled and coordinated. It provides a means for new requirements to be accommodated taking into account schedule and resource constraints, as well as the importance of implementing a new requirement. The purpose of this document is to describe the plan used to implement the program. It describes how the program functions, mechanisms for changing the program and updating it, the interactions and responsibilities of the NRC and licensee staffs under the program, and its resultant assessments and schedules.

II. SUMMARY OF PROGRAM DEVELOPMENT

The program is based on a list of issues, their associated resolutions and completion dates, each of which is assigned a priority resulting from an established assessment method. Assessments are performed by the Big Rock Point Plant Technical Review Group (TRG), and the assessment method involves ranking each issue or issue resolution based on its importance relative to safe shutdown, radiological release potential,

personnel safety, and plant availability. The scheduling of issue resolutions takes into account projections for budgets and site manpower and engineering support requirements for three years, on an item-by-item basis covering all significant plant modification activities. The list represents that significant portion of the Big Rock Point Plant work list and commitment list which is regularly modified and updated to meet changing conditions, including new NRC regulatory requirements. The final product of this program is the assessment of issues or issue resolutions and the development of associated schedules as discussed below.

III. ASSESSMENT AND SCHEDULING

A first step in the development of this program involved a listing of significant open issues and their associated resolutions. In cases where a resolution to a particular open issue was not yet identified, the issue itself was retained in the list. Upon completion of the work listing, CPC determined that an assessment of issues or issue resolutions was required to determine their appropriate ranking. Upon TRG completion of the issue assessment and ranking (using, in some cases, the results of probabilistic risk assessment studies), the tasks associated with each issue resolution were scheduled based on their assigned ranking and available resources. The issues or issue resolutions were organized into Issue Groups A and B based upon the origin of the issue and its ranking. Completion schedules and periodic status reports identify critical project tasks, target completion dates, progress and problem areas which enable management to develop contingency and/or schedule recovery plans. Both Issue Groups are briefly described below:

Issue Group A - All issues which have resolutions and/or issue resolution implementation dates mandated by NRC rules, orders or license conditions.

Issue Group B - Issues (of either a generic or plant specific nature) identified by the NRC or CPC which have resolutions and/or completion dates committed to by CPC, and which would result in either a) plant modifications, b) procedure revisions, or c) changes in facility staffing requirements.

Issue resolutions and/or implementation dates in Issue Group A may be modified or deleted only with prior approval of the NRC, in accordance with existing NRC regulations. Changes to the issue resolution and/or completion dates in Issue Group B require notification to the NRC as described in Section V. Issue Groups A and B, taken together, provide a basis for assessing the overall effects of changes to issue resolutions and/or schedules, and a departure point for discussion between the NRC and the licensee regarding such changes, as discussed below.

IV. ISSUE RESOLUTION AND SCHEDULE MODIFICATIONS

An important aspect of CPC's planning effort is the recognition that the issues, issue resolutions, and scheduled completion dates will need to be modified or deleted at times to reflect changes in regulatory requirements, to accommodate those activities that CPC finds necessary to improve plant efficiency and reliability, to incorporate the results of investigations into issues, and to take into account delays resulting from events beyond CPC's control. The procedure used by CPC for changing or deleting issues, issue resolutions, or scheduled completion dates will be developed and included in a separate volume of the Big Rock Point Plant Manuals.

V. CPC AND NRC RESPONSIBILITIES

The proper functioning of the Integrated Plan requires that CPC apply consistent criteria to the assessment of issues, monitor the progress of all work undertaken, manage its activities to maintain the schedule, and act promptly to take necessary actions when an issue resolution or schedule change is needed. As set forth herein the NRC will treat all Integrated Plan issues consistently and recognize that, when necessary, ranking, issue resolutions, and/or scheduled completion date changes are based on a comparison of the issue being changed to all the Integrated Plan issues, and also account for resource constraints.

A. PERIODIC UPDATING

CPC will update Issue Groups A and B semi-annually and submit the revised Integrated Plan to the NRC, beginning six months following NRC approval of this plan. The revised Integrated Plan will include the following:

- ° Summarize progress in completing or implementing issue resolutions.
- ° Identify changes since last update report.
- ° Summarize the reasons for issue resolution and/or schedule changes associated with regulatory requirements.

B. CHANGES TO ISSUE RESOLUTIONS AND/OR SCHEDULES

Changes to the Integrated Plan may arise from a variety of reasons, such as new issues identified; modifications to the scope of scheduled work; unplanned outages; results of investigations into an

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- 1 The listing of issues in Issue Groups A and B will contain sufficient detail to identify those issues with tasks and/or completion dates keyed to refueling outages. In such cases, a change in outage period (ie, initiation or duration) shall not be considered a schedule change.

issue (eg, PRA findings); problems in delivery, procurement, etc; changes in NRC rules and regulations; or other NRC or CPC actions.

Where it is necessary to add a new issue or to change the schedule for an issue, the following general guidance will be utilized to the extent appropriate:

- ° Assess the priority of the issue relative to all existing Integrated Plan issue resolutions.
- ° Schedule the new or changed issue resolution to avoid rescheduling other issues, if it can be reasonably achieved.
- ° Alter Issue Group B items before Issue Group A items.
- ° Select a schedule for the new or changed issue resolution which will help in maintaining an optimum integrated program of work.

Addition of activities to Issue Group A requires CPC to propose appropriate issue resolutions and/or completion dates and requires NRC approval of such proposals. Changes to previously established Issue Group A resolutions and/or resolution implementation dates will be proposed only after CPC has determined that changing Issue Group B issues will not significantly assist in maintaining Issue Group A without change; or that safety, resource or schedule penalties from rescheduling Issue Group B activities significantly outweigh the consequences of a change in an Issue Group A completion date. As with proposals to add Issue Group A activities, proposals to change previously existing Issue Group A activities also requires NRC approval.

CPC will inform the NRC Project Manager when serious consideration is given to requesting a change in Issue Group A. When CPC determines that a change in Issue Group A is necessary, it will submit a written request for NRC approval in accordance with applicable regulations.

Issue resolutions in Issue Group B may be modified, deleted or rescheduled, or new issues may be added to Issue B by CPC without NRC approval; however, CPC will inform the NRC Project Manager once it has been determined that a change, deletion, or addition is necessary. CPC will provide the NRC with written notification of changes or deletions of Issue Group B issue resolutions or completion dates associated with NRC initiated issues at least 30 days prior to Plan-scheduled completion date. Such notification will also include the reasons for the change and describe any compensatory actions which CPC determines to be appropriate.

The change, addition or deletion in Issue Group B will go into effect upon evaluation by the TRG, unless the NRC, in writing, requests further explanation or discussion. NRC requests will be made within 15 days of receipt of CPC written notification. In this

event, discussions will be initiated to promptly develop an issue resolution and/or schedule which is mutually acceptable to CPC and the NRC Project Manager while considering overall program impact. The written notification by the NRC will serve to extend the schedule date for the period of time required for such discussion. If a revised issue resolution and/or schedule is established in these discussions, such issue resolution and/or schedule will supersede the issue resolution and/or schedule set forth in Issue Group B. The revised issue resolution and/or schedule will be incorporated in a revised Issue Group B in the next update submitted to the NRC. If a revised issue resolution and/or schedule cannot be established in these discussions, CPC changes to issue resolutions and/or schedule dates will be effective unless subsequently modified by NRC Order.

In the event of unplanned delays, delays which become manifest within 30 days of the Plan-scheduled completion date or in the event of circumstances beyond CPC's control, CPC shall provide timely notification to the NRC Project Manager of the revised issue resolution and/or schedule date and incorporate it in a revised Issue Group B in the next update submitted to the NRC.

VI. NRC REVIEW

As pointed out in Section V.B above, changes to the issues and/or schedules are inevitable. Action required by the NRC is discussed below:

A. CONSUMERS POWER COMPANY ORIGINATED CHANGES

1. Upon receipt from CPC of a request for modification of Issue Group A, the NRC will act promptly (consistent with resource availability and priority of other work) to consider and decide on the request in accordance with applicable procedures.
2. If the request for a modification of Issue Group A is denied, NRC shall promptly inform CPC and provide the reasons for denial.
3. NRC consideration of CPC changes to non-Issue Group A issues and/or schedules is covered by Section V.B.

B. NRC ORIGINATED CHANGES (ISSUE GROUP A)

It is recognized that formal NRC regulatory actions (ie, NRC rules, orders, or license conditions) may: (1) impose a new regulatory requirement with a fixed date, or (2) establish a firm date for a previously identified regulatory requirement. In taking any such action, the NRC, to the extent consistent with its overall regulatory responsibilities and, unless public health, safety, or interest require otherwise, will take into account the impact of such action on CPC's ability to complete effectively the issues in Issue

Groups A and B, and, in consultation with CPC, will try to minimize such impact. Although any formal regulatory action (ie, regulatory rule, order, or license condition) taken by the NRC will be effective in accordance with its terms without inclusion in Issue Group A, the NRC and CPC recognize the desirability of incorporating such action into Issue Group A, particularly in order to incorporate at the same time any other appropriate changes in the total integrated assessment program. Accordingly, once such formal regulatory action is taken (or earlier, if practicable), the NRC will provide CPC a reasonable opportunity to propose overall changes in the total integrated assessment program which would most effectively accommodate such requirements. Any resulting changes in issues in Issue Group A will be (1) reviewed by the NRC, taking in account the overall objective of the Integrated Assessment Program to use available resources effectively, and (2) approved by the NRC in accordance with established procedures, and will thereupon be reflected in a revised Issue Group A submitted by CPC. CPC will inform the NRC of any resulting changes in Issue Group B in accordance with Section V above.

C. NEW NRC ISSUES (ISSUE GROUP B)

The NRC may, from time to time, identify new regulatory issues which may result in (a) plant modifications, (b) procedure revision or development, or (c) changes in facility staffing requirements. With respect to issues which the NRC requests (1) scheduling information or (2) responses by a certain date, these issues may be included in Issue Group B in accordance with the issue resolution priority resulting from the TRG assessment. Issue resolutions and/or date commitments resulting from TRG evaluation will form the basis for discussions between the NRC and CPC. As for the case of NRC-originated changes to Issue Group A issues, the NRC will provide CPC a reasonable opportunity to propose overall changes in the total integrated plan program which would most effectively accommodate such issues. Any resulting changes in the integrated plan program will thereupon be reflected in a revised Issue Group B submitted by CPC.

VII. MODIFICATION TO THE PLAN

The licensee and the NRC recognize that the Plan itself may require future modifications. Accordingly, all Plan revisions will be submitted for prior NRC approval in accordance with existing NRC regulations. The revisions will be made effective upon amendment issuance by the NRC.