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Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

Patrick M Donnelly
Plant Manager

February 10, 1997

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

**DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - LICENSEE EVENT REPORT
97-002: PENETRATION INSPECTION NOT PERFORMED IN ACCORDANCE WITH TECHNICAL
SPECIFICATIONS.**

Licensee Event Report 97-002, **PENETRATION INSPECTION NOT PERFORMED IN
ACCORDANCE WITH TECHNICAL SPECIFICATIONS**, is attached. This event is
reportable to the Nuclear Regulatory Commission in accordance with 10 CFR
50.73(a)(2)(i) - Any operation prohibited by the plant's technical
specifications


Robert J Addy
Assistant Plant Manager

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

ATTACHMENT

9702180324 970210
PDR ADOCK 05000155
S PDR

LICENSEE EVENT REPORT (LER)

(See reverse for required number of
digits/characters for each block)ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY
INFORMATION COLLECTION REQUEST: 60.0 HRS. REPORTED LESSONS LEARNED ARE
INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY.
FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND
RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY
COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK
REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET,
WASHINGTON, DC 20503

FACILITY NAME (1)

BIG ROCK POINT NUCLEAR PLANT

DOCKET NUMBER (2)

50-155

PAGE (3)

1 OF 3

TITLE (4)

Penetration Inspection Not Performed in Accordance With Technical Specifications

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
1	15	97	97	002	00	2	10	97	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		0%	20.2201(b)		20.2203(a)(2)(v)		X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)			50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)			50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)			50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)			50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)			50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME

Michael D. Bourassa, Licensing Supervisor

TELEPHONE NUMBER (INCLUDE AREA CODE)

1-616-547-8244

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRPDS
D	BD	NA	NA	N					

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

Big Rock Point Technical Specification 3.7(c) requires that "Each reactor shutdown for refueling, but in no case at intervals greater than two years, all electrical and accessible piping penetration nipple welds be visually examined for evidence of corrosion, cracking or deterioration".

Contrary to the above, two containment electrical penetrations, H-115A and H-115B, had not been inspected since they were installed in 1985. Both penetrations are located on the bottom of the equipment air lock under the floor. The electrical penetrations had been considered inaccessible due to the floor plates being welded in place, therefore inspections during refueling outages were not performed. This discovery was made while the plant was shutdown, and containment integrity was not required.

In 1985, TS 3.7(c) was interpreted to treat electrical and piping penetrations the same; that is, only accessible penetrations required inspection. Following closer review, the Big Rock Staff has concluded that this interpretation was incorrect.

The penetrations were accessed by grinding/cutting the grating and flooring as required. The penetrations were inspected and no evidence of deterioration or cracking was detected. The grating/flooring was tack welded back in place to facilitate future inspections.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Big Rock Point Nuclear Plant	50-155	97	002	00	2 OF 3

TEXT (If more space is required, use additions: copies of NRC Form 366A) (17)

IDENTIFICATION OF EVENT

This event is reportable to the Nuclear Regulatory Commission pursuant to :

10 CFR 50.73(a)(2)(i)(B) - "Any operation prohibited by the plant's Technical Specifications".

REFERENCES

1. Big Rock Point Technical Specification 3.7(c).
2. TV-01, Visual Inspection of Penetration Welds, Expansion Joints and/or Electrical Penetration.
3. T-180-01B, Personnel and Equipment Lock Sphere Component Leak Rate Test.
4. Facility Change 462J, Appendix R Penetration Nozzle Installation.

EVENT DESCRIPTION

Big Rock Point Technical Specification 3.7(c) requires that "Each reactor [RCT] shutdown for refueling, but in no case at intervals greater than two years, all electrical and accessible piping penetration [PEN] nipple welds be visually examined for evidence of corrosion, cracking or deterioration".

Contrary to the above, two containment [NH] electrical penetrations, H-115A and H-115B, had not been inspected since they were installed in 1985. Both penetrations are located on the bottom of the equipment air lock under the floor. The electrical penetrations had been considered inaccessible due to the floor plates being welded in place, therefore inspections during refueling outages were not performed. This discovery was made while the plant was shutdown, and containment integrity was not required.

ROOT CAUSE

A root cause analysis was performed and concluded that the modification process for Facility Change 462J, Appendix R Penetration Nozzle Installation, did not provide adequate review to assure compliance with the Technical Specifications.

In 1985, TS 3.7(c) was interpreted to treat electrical and piping penetrations the same; that is, only accessible penetrations required inspection. Following closer review, the Big Rock Staff has concluded that this interpretation was incorrect.

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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

CORRECTIVE ACTION

Immediate

The penetrations were accessed by grinding/cutting the grating and flooring as required. The penetrations were inspected and no evidence of deterioration or cracking was detected. The grating/flooring was tack welded back in place to facilitate future inspections.

Long Term

The plant procedure for containment penetration inspection, TV-01, has been revised to eliminate the "inaccessible" designation from penetrations H-115A and H115B.

Note: The modification process will not be modified as this was the result of a 1985 activity and does not represent an increasing trend according to the Corrective Action System.

SAFETY SIGNIFICANCE

This issue had no safety significance. The penetrations were inspected, and no evidence of deterioration or cracking was detected. During plant operation since 1985, T-180-01B, Personnel and Equipment Lock Sphere Component Leak Rate Test, checked the integrity of the equipment lock, including both penetrations. The results of this local leak rate test have been within the acceptance criteria for the test, ensuring that containment integrity was not compromised.