



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 15, 1985

Docket No. 50-155
LS05-85-11-022

Mr. Kenneth W. Berry
Director, Nuclear Licensing
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Berry:

SUBJECT: SAFETY EVALUATION FOR ENVIRONMENTAL QUALIFICATION OF
SAFETY-RELATED ELECTRICAL EQUIPMENT

Re: Big Rock Point Plant

Enclosed is the staff's Safety Evaluation (SE) which addresses the environmental qualification of electric equipment important to safety for Big Rock Point for compliance with the requirements of 10 CFR 50.49. Also addressed are your proposed resolutions for the deficiencies identified in the staff's earlier SE dated April 26, 1983, and the February 18, 1983, Franklin Research Center Technical Evaluation Report enclosed with the SE. The staff has also reviewed the justification for continued operation (JCO) presented by Big Rock Point for selected equipment and has determined herein, these JCO to be acceptable; however, it is expected the need for JCO will not exist after November 30, 1985.

On March 14, 1984, a meeting was held with Consumers Power Company to discuss their proposed method of resolution for each of the environmental qualification deficiencies identified. Discussions also included Consumers Power Company's general methodology for compliance with 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants," which became effective February 22, 1983, and JCO for those equipment items for which environmental qualification is not yet completed. As a result of this meeting an audit of Consumers Power Company's Environmental Qualification files was performed by the NRC on June 5 through June 7, 1984. The licensee then provided submittals, by letters dated June 29, July 18, August 27, and October 31, 1984, January 7 and 28, 1985, and February 7 and 21, 1985, addressing the above and documenting the discussions held at the meeting and the audit. An additional meeting was held on September 5, 1984 to discuss progress and define objectives.

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documenting the qualification of safety-related electric equipment. The October order required the establishment of a central file location for the maintenance of all equipment qualification records. The central file was mandated to be established by December 1, 1980. The staff subsequently issued a Safety Evaluation Report (SER) on environmental qualification of safety-related electrical equipment to the licensee on June 1, 1981 documenting the environmental qualification deficiencies. This SER directed the licensee to "either provide documentation of the missing qualification information which demonstrates that safety-related equipment meets the DOR Guidelines or NUREG-0588 requirements or commit to a corrective action (requalification, replacement, etc.)." The licensee was required to respond to NRC within 90 days of receipt of the SER.

In response to the staff SER issued in 1981, the licensee submitted additional information regarding the qualification of safety-related electric equipment. This information was evaluated for the staff by the Franklin Research Center (FRC) in order to: (1) identify all cases where the licensee's response did not resolve the significant qualification issues, (2) evaluate the licensee's qualification documentation in accordance with established criteria to determine which equipment had adequate documentation and which did not, and (3) evaluate the licensee's qualification documentation for safety-related electric equipment located in harsh environments required for TMI Lessons Learned Implementation. A Technical Evaluation Report (TER) was issued by FRC on February 18, 1983. An SER was subsequently issued to the Consumers Power Company on April 26, 1983 with the FRC TER as an attachment.

A final rule on environmental qualification of electric equipment important to safety for nuclear power plants became effective on February 22, 1983. This rule, Section 50.49 of 10 CFR Part 50, specifies the requirements to be met for demonstrating the environmental qualification of electric equipment important to safety located in a harsh environment. In accordance with this rule, equipment for Big Rock Point may be qualified to the criteria specified in either the DOR Guidelines or NUREG-0588, except for replacement equipment. Replacement equipment installed subsequent to February 22, 1983 must be qualified in accordance with the provision of 10 CFR 50.49, using the guidance of Regulatory Guide 1.89, unless there are sound reasons to the contrary.

A meeting was held with each licensee of plants for which a TER had been prepared for the staff by FRC in order to discuss all remaining open issues regarding environmental qualification, including acceptability of the environmental conditions for equipment qualification purposes, if this issue had not yet been resolved. On March 14, 1984, a meeting was held to discuss Consumers Power Company's proposed method to resolve the environmental qualification deficiencies identified in the April 26, 1983 SER and February 18, 1983 FRC TER. Discussion also included Consumers Power Company's general methodology for compliance with 10 CFR 50.49, and justification for continued operation (JCO) for those equipment items for which environmental qualification is not yet completed. As a result of this meeting an audit was performed on June 5 through 7, 1984 by the NRC. The audit consisted of a review of ten files containing information regarding the equipments environmental qualification.

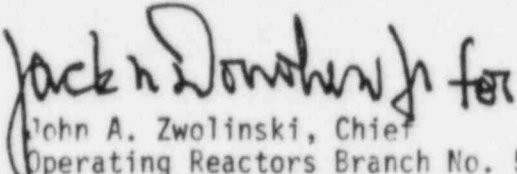
Mr. Kenneth W. Berry

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Based on discussions during the meetings, the audit and a review of the licensee's submittals, we have concluded that Consumers Power Company's Equipment Qualification Program is in compliance with the requirements of 10 CFR 50.49, that the proposed resolution for each of the environmental qualification deficiencies identified for Big Rock Point is acceptable, and that continued operation of Big Rock Point will not present undue risk to the public health and safety.

Sincerely,


John A. Zwolinski, Chief
Operating Reactors Branch No. 5
Division of Licensing

Enclosure:
Safety Evaluation

cc w/enclosure:
See next page

Mr. Kenneth W. Berry
Consumers Power Company

Big Rock Point Plant

cc:

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