Consumers Power Company

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

September 1, 1972

Mr. John F. O'Leary, Director   Re: Docket No 50-155
Directorate of Licensing   License No DPR-6
United States Atomic Energy
   Commission
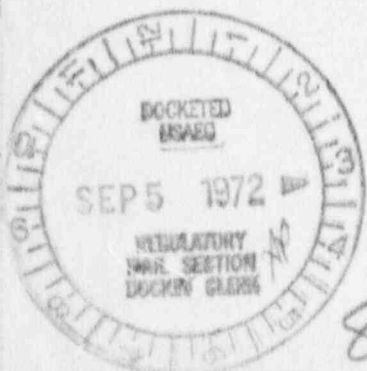Washington, DC 20545

Dear Mr. O'Leary:

Attached is one (1) original and thirty-nine (39) con-
formed copies of Special Report No 13 titled "Containment Leak Rate
Test - 1972." This test was conducted during April 1972 to fulfill
the Big Rock Point Plant Technical Specification requirements.

The test was conducted, to the maximum extent practical,
in accordance with Proposed Appendix J to 10 CFR 50. Based on the
experience gained while performing this leak rate test, we offer
the following comments on Appendix J:

1. Section III.A.2(c) of the proposed amendment requires
a 4-hour stabilization period prior to the start of the leakage rate
test. Since installation of the compressor air coolers at Big Rock
Point, we have not observed any stabilization problems which would
be significantly improved by a 4-hour waiting period. We propose
that if a stabilization period is required, Section III.A.2(c) of the
proposed amendment be changed to read:

"c. The containment test pressure shall be allowed
to stabilize prior to the start of the leakage rate test for a
period based on previous experience."

2. Section III.A.3(c) implies that data may be used only
on an hourly basis. It is apparent that in keeping with good sta-
tistical analysis, periods of shorter than one hour could be used to
obtain more accurate results. We suggest that the second sentence of
Section III.A.3(c) be changed to read:

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"Measurements shall be recorded at least hourly and the leakage rate determined at least hourly with respect to the initial set of containment test measurements."

Yours very truly,

Ralph B. Sewell
Nuclear Licensing Administrator

RBS/dmb

CC: BHGrier,
    USAEC
    Secretary of the
      Commission,
    USAEC