



Consumers
Power
Company

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August 24, 1979

Director, Nuclear Reactor Regulation
Att Mr Dennis L Ziemann, Chief
Operating Reactors Branch No 2
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - FIRE PROTECTION
MODIFICATIONS: ALTERNATE SHUTDOWN PANEL

Amendment 25 to License DPR-6 requires that certain modifications be made to the Big Rock Point Plant for fire protection purposes. The modifications are described in the Fire Protection Safety Evaluation (SE) forwarded with Amendment 25. Amendment 25 states, in part, "These modification will be completed in accordance with Table 3.1 of the SE and supplements thereto."

Item 3.1.1 of Table 3.1 of the Fire Protection SE is an alternate safe shutdown system. This letter requests that a supplement to Table 3.1 be issued incorporating the installation of this alternate system with modifications which might be required as a result of the Systematic Evaluation Program (SEP).

Ongoing reviews related to certain topics in the SEP program (eg, VII-1.A - Isolation of Reactor Protection System from Nonsafety Systems, VII-3 - Systems Required for Safe Shutdown, VII-4 - Effects of Failure in Nonsafety Related Systems on Selected Engineered Safety Features, and XV-24 - Loss of All A-C Power) could require modifications that will impact the size, location, or detailed engineering design of the alternate shutdown system. Backfitting of modifications to the alternate shutdown system would be extremely difficult since the area wherein the panel associated with this system is to be located is not large enough to accommodate an increase in panel size. No other area is available where the panel can be located and still maintain adequate separation from other shutdown systems to satisfy fire protection concerns. Any increase in panel size resulting from yet-to-be-determined SEP requirements would likely require a new structure to be built. Still other SEP topics could affect the size and location of any new structure and, thus, information available at this time is inadequate to design and build such a structure. Similar sizing and design constraints apply to the new d-c power supply associated with the alternate safe shutdown system.

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Changes to an existing installation to resolve any concerns raised during SEP review would be possible but undesirable. As discussed above, such changes would be likely to result in an alternate shutdown control panel in two parts, physically separated from each other. Consumers Power Company considers that incorporating the alternate shutdown system into design changes necessitated by SEP would result in a system which better addresses all concerns.

To permit incorporating alternate shutdown system design and installation into SEP efforts, Consumers Power Company requests that a supplement to the Big Rock Point Fire Protection Safety Evaluation, Table 3.1, be issued stating that Item 3.1.1 has been incorporated into the Systematic Evaluation Program and that the detailed schedule is currently under development. Since other modifications listed in Table 3.1 to provide improved fire protection will be accomplished in accordance with the schedule therein, Consumers Power Company considers that the proposed delay in alternate shutdown system installation does not result in an unacceptable risk to public health and safety.

Installation of the proposed alternate safe shutdown system in accordance with the schedule currently included in Table 3.1 would require procurement of certain items of equipment and start of fabrication in the near future. To prevent unnecessary effort, prompt action on this request would be appreciated.

David A Bixel (Signed)

David A Bixel
Nuclear Licensing Administrator

CC JGKepler, USNRC

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