



**Consumers
Power
Company**

COPY

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May 6, 1980

Director, Nuclear Reactor Regulation
Att Mr Dennis M Crutchfield, Chief
Operation Projects Branch No 5
U S Nuclear Regulatory Commission
Washington, D C 20555

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - FIRE PROTECTION -
INTERIM PROCEDURES TO ASSURE SAFE SHUTDOWN

Amendment 25 to License DPR-6 requires that certain modifications be made to the Big Rock Point Plant for fire protection purposes. One of these modifications is an alternate safe shutdown system (Item 3.1.1 of the Fire Protection Safety Evaluation accompanying Amendment 25). Consumers Power Company letter dated August 24, 1979, requested that a supplement to the Big Rock Point Fire Protection Safety Evaluation be issued authorizing incorporation of the alternate safe shutdown system modification with other modifications which may result from the NRC's Systematic Evaluation Program.

NRC (R Silver) stated in a telephone conversation with Consumers Power Company (R Huston) on February 20, 1980, that issuance of the requested supplement would be contingent upon agreement to implement position number 2 of NRC letter dated January 29, 1979. This position specified that emergency shutdown procedures be developed to assure safe shutdown for postulated fires in the penetration areas or electrical equipment room. These procedures were to include actions to restore power to pumps capable of providing water to the primary system. Consumers Power Company's previous response to this position, dated February 12, 1979, stated that our commitment to install an alternate safe shutdown system obviated the need for such procedures.

Consumers Power Company agrees that interim emergency procedures, as requested in the NRC position, are appropriate in view of the proposed delay in installing the alternate safe shutdown system. Detailed procedures will be developed to accomplish safe shutdown in the event of fires in the electrical equipment room or in the penetration area (inside or outside containment). These procedures will include steps to provide power to a control rod drive pump (capable of providing water to the primary system). The procedures will specify temporary connections to provide power to a pump in the event power feed is destroyed by a fire in one of these areas. These temporary connections will be made when the fire is extinguished. Several penetration assemblies have been identified

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for use, providing the maximum physical separation practical considering the plant's single electrical penetration area.

Implementation of the NRC position as described above improves Big Rock Point's capabilities to withstand postulated fires. Accordingly, Consumers Power Company requests that a supplement to the Fire Protection Safety Evaluation be issued as discussed in our August 24, 1979, letter.

Roger W Huston (Signed)

Roger W Huston
Senior Licensing Engineer

CC JGKepler, USNRC