



Consumers
Power
Company

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April 17, 1980

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Region III
US Nuclear Regulatory Commission
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DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK
POINT PLANT - REVISION TO CONSUMERS POWER
COMPANY SUBMITTAL DATED OCTOBER 31, 1979 -
RESPONSE TO IE BULLETIN 79-14: SEISMIC
ANALYSIS FOR AS-BUILT SAFETY-RELATED PIPING

Attached please find Revision 1 (dated April 2, 1980) to Consumers Power Company's October 31, 1979 120-day response to IE Bulletin 79-14. Revised portions of the text are indicated by a vertical line in the right margin. Please remove the affected pages and insert the updated pages provided.

This revision was necessitated as a result of concern raised by an NRC I&E inspector's visit shortly after work relating to the reference bulletin was completed by Consumers Power Company.

The NRC I&E inspector's concern centered around that portion of the Reactor Depressurization System (RDS) piping from the safety relief valves to the steam drum enclosure wall which was not included in our safety analysis. However, the inspector insisted that this portion of piping was a continuation of the RDS piping which is safety-related and indicated we should inspect same. The inspection was done with the results shown in the attachment.

David P Hoffman
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement

Attachment Final Response to IE Bulletin 79-14

APR 22 1980

FINAL RESPONSE
TO
U.S. NRC IE BULLETIN 79-14
FOR
BIG ROCK POINT NUCLEAR PLANT
CONSUMERS POWER COMPANY

October 31, 1979

Revision 1, April 2, 1980

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3. SYSTEM IDENTIFICATION

Current BRP systems were reviewed, and those systems having safety-related piping are listed below, along with the applicable Piping and Instrumentation Diagram (P&ID) drawing numbers.

<u>P&ID</u>	<u>SYSTEM</u>
0740G40106	Steam and condensate system
0740G40107	Reactor cleanup, shutdown, and poison system
0740G40108	Radwaste system
0740G40111	Circulating, cooling, and service water systems
0740G40121	Nuclear steam supply system
0740G40122	Control rod drive system
0740G40123	Fire and post-incident cooling system
0740G40125	Ventilating, heating, and cooling system
0740G41003	Reactor depressurization system

Appendix D of this report provides reduced copies of the record drawings which delineate the boundaries of safety-related piping in the various systems.

4. INSPECTION

A. PERIOD OF INSPECTION

Inspection was performed at BRP during the period from August 15, 1979, to November 10, 1979. Approximately 6,000 feet of pipe and 420 supports were inspected as well as the associated in-line components (valving, etc).

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B. ELEMENTS OF INSPECTION

- 1) The inspection was performed according to Field Procedure 1 which is included as Appendix E of this report.
- 2) The essential items verified by the inspection are as follows:
 - a) Pipe geometry
 - b) Support design, location, function, and clearance
 - c) Embedments
 - d) Pipe attachments

H. ADDITIONAL INSPECTION

In addition to the piping designated in Drawing 0740G41003 (see Appendix D), piping from the safety relief valves (SV-4984, -4985, -4986, and -4987) to the steam drum enclosure wall was inspected. This additional inspection was suggested by the Region III inspector in an inspection meeting on November 7, 1979, at BRP.

APPENDIX F

EVALUATIONS OF ITEMS NOTED DURING INSPECTION (continued)

Item	Daily Discrepancy Report	System	CPCo P&ID Drawing for System	Item Noted During Inspection	Resolution
141	27	Reactor depressurization	0740G41003	The design drawing is unclear. It appears to show that support PS-109 is attached to line 103D at the platform. Support PS-109 is actually located above the platform.	The existing piping configuration has been compared to the configuration used in the piping analysis, and the difference is acceptable.
142	27	Reactor depressurization	0740G41003	Details in Drawing 0740G11003 for PS-110 supports call for a 1/16-inch clearance between the pipe and pipe clamp. Clearances in all cases are greater, averaging 1/4-inch (pipe was cold when measured).	The difference in clearance is not significant and is acceptable. Additionally, the clearance will decrease when the system is operating.
143	27	Reactor depressurization	0740G41003	Lock nuts on the two 1-1/2-inch through bolts on support PS-113 are loose.	These nuts have been tightened.
144	27	Reactor depressurization	0740G41003	The restraint detail in Drawing 0740G11003 calls for pipe clamp bolts to be single nutted, 2-1/2 inches in diameter, and 10-1/2 inches long on all eight PS-110 supports. All are actually double nutted, with a 2-1/2-inch diameter and 17-inch length.	The additional length and nuts do not affect the function of the restraint and are acceptable.
145	27	Reactor depressurization	0740G41003	The design drawing indicates that base plates for PS-110 supports are typical (35 inches long from end to end and 5 inches from the end to the centerline of the bolt hole). The four restraints on the C and D lines do not conform (31 inches long from end to end,	These differences do not affect the support function and are acceptable.

APPENDIX F

EVALUATIONS OF ITEMS NOTED DURING INSPECTION (continued)

Item	Daily Discrepancy Report	System	CPCo P&ID Drawing for System	Item Noted During Inspection	Resolution
146	27	Reactor depressurization	0740G41003	<p>2-1/2 inches from one end to the bolt centerline, and 5 inches from the opposite end to the bolt centerline).</p> <p>The design drawing shows a distance of 1'-9" from the pipe centerline to the top of the grout under the base plate for PS-110 supports. Measured distance from the pipe centerline to the wall was 25 inches for the four PS-110 supports on lines A and B, and 23 inches for the upper PS-110 support on line C. Grout thicknesses ranged from 3/4 inch to 1-1/2 inches.</p>	Because of the relatively close spacing of supports on these lines, the dimensional change has an insignificant effect and is acceptable. Grouting is as specified on the drawing.
147	27	Reactor depressurization	0740G41003	The lower PS-110 support on line A had no washers under the nuts on two anchor bolts. The bottom two holes in the base plate appear to have been enlarged with a cutting torch and are partially visible around the nuts.	Anchor bolt evaluation was performed in accordance with U.S. NRC IE Bulletin 79-02.
148	27	Reactor depressurization	0740G41003	The design drawing for PS-112 supports indicate that the anchor bolts on the base plates have single nuts with washers. PS-112 supports on lines B, C, and D have double nuts with no washers. The PS-112 support on line A has three bolts with double nuts and no washers, and one bolt with a single nut and no washer.	Anchor bolt evaluation was performed in accordance with U.S. NRC IE Bulletin 79-02.

APPENDIX F

EVALUATIONS OF ITEMS NOTED DURING INSPECTION (continued)

Item	Daily Discrepancy Report	System	CPCo P&ID Drawing for System	Item Noted During Inspection	Resolution
149	27	Reactor depressurization	0740G41003	The east corner of the lower base plate on support PS-113 was cut off so that it would fit beside another base plate.	Anchor bolt evaluation was performed in accordance with U.S. NRC IE Bulletin 79-02.