

CONSUMERS POWER COMPANY

Docket 50-155
Request for Change to the Technical Specifications
License DPR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in the Facility Operating License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964, for the Big Rock Point Plant be changed as described in Section I below:

I. Change(s)

Section 11.4.3.4.B

Replace phrase, "At least once every six (6) months, except for periods of continuous shutdown when the following shall be performed prior to startup:", with:

"At least once every refueling outage not to exceed eighteen (18) months the following shall be performed prior to startup:"

Table 11.4.3.4

Replace phrases, "Once every six months of operations other than shutdown", and "each major refueling", with:

"Each refueling outage not to exceed eighteen (18) months"

II. Discussion

The above proposed Technical Specifications changes are requested to alleviate reactor shutdown for the sole purpose of containment spray system surveillance. Current surveillance requirements necessitate a cold shutdown to perform testing. The backup containment spray valve MO 7068 is required to have its power supply breaker open during power operation (Section 11.3.3.4 A) and is thus not testable during power operation. The specified valve testing requires draining of the header common to the containment spray and core spray systems which renders these safety systems inoperable.

The applicable current test interval guidance of NUREG-0123, "Standard Technical Specifications for General Electric Boiling Water Reactors", paragraph 4.6.2.1, specifies that the suppression chamber operability shall be verified by a visual inspection at least once per eighteen (18) months. The suppression chamber in recent BWR designs provides the safety function intended for the Big Rock Point containment sprays. The containment design with a spray system at Big Rock Point more closely approximates standard PWR containment design; therefore, the guidance of NUREG-0212, "Standard Technical Specifications for Combustion Engineering Pressurized Water Reactors", paragraph 4.6.2.1, for the containment quench spray system surveillance requiring operability verification at least once per eighteen (18) months during shutdown is more appropriate.

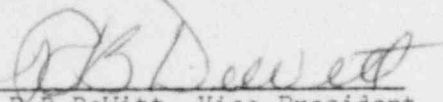
The applicable sections of the referenced Standard Technical Specifications provide guidance for justification of an extended surveillance interval for the containment spray system to an at least once every refueling outage not to exceed eighteen (18) months schedule as proposed. Licensee Event Report records indicate that there have been no failures in the last five (5) years involving valves (MO 7064 and MO 7068) which substantiates the acceptability of the requested change.

III. Conclusion(s)

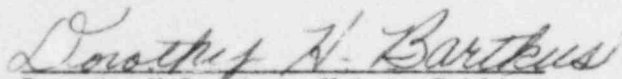
Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have reviewed these changes and find them acceptable.

CONSUMERS POWER COMPANY

By


R. B. DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 7th day of July, 1980.



Dorothy H. Bartkus, Notary Public
Jackson County, Michigan

My commission expires March 26, 1983