T/C

Consumers Power Company

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • (517) 788-0550

September 2, 1980

Mr James G Keppler
Office of Inspection and Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - RESPONSE TO
SUPPLEMENT NO 3 TO IE BULLETIN NO 80-17 -
FAILURE OF CONTROL RODS TO INSERT DURING
A SCRAM AT A BWR

IE Supplement No 3, dated August 22, 1980, to IE Bulletin No 80-17, "Failure of 76 of 185 Control Rods to Fully Insert During a Scram at a BWR" (July 3, 1980) requested that action be taken to mitigate accumulated scram valve seal leakage which could fill the scram discharge volume.

As discussed in our previous letters in response to IE Bulletin No 80-17 items, specifically the August 8, 1980 letter, Big Rock Point has a significantly different scram system design that BWR-II and later plants. Its present design provides instrumentation that indicates to the control room accumulation of water in the scram discharge volume (ie, scram discharge tank) and initiates an automatic scram prior to insufficient scram discharge volume (SDV) capacity. Specific responses to Supplement No 3 questions are provided for your information by Attachment I.

In summary, Consumers Power Company concludes that the current Big Rock Point scram discharge system meets the requirements set forth in IE Bulletin No 80-17 and its Supplements Nos 1 thru 3 without additional modifications or surveillance.

David P Hoffman
Nuclear Licensing Administrator

CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector - Big Rock Point

Attachment - 1 page

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CONSUMERS POWER COMPANY

Big Rock Point Plant

IE Bulletin 80-17
Supplement No 3

Docket 50-155
License DPR-6

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits our response to Supplement No 3 to IE Bulletin No 80-17 dated August 22, 1980, entitled, "Failure of Control Rods to Insert During a Scram at a BWR". Consumers Power Company's response is dated September 2, 1980.

CONSUMERS POWER COMPANY

By R B DeWitt
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 2nd day of September, 1980.

Linda K Carstens
Linda K Carstens, Notary Public
Jackson County, Michigan
My commission expires June 10, 1981.

ATTACHMENT I

Response to IE Supplement 3 to Bulletin No 80-17:

Failure Of Control Rods To Insert During A Scram At A BWR

Action 1

For those plants in which the scram discharge volume headers are connected to the instrument volume by a 2-inch pipe, within five days of the date of this Bulletin, provide or verify that procedures are in effect to:

a. Require an immediate manual scram on low control rod drive air pressure with a minimum 10 psi margin above the opening pressure of the scram outlet valves.

b. Require an immediate manual scram in the event of:

(1) Multiple rod drift-in alarm, or

(2) A marked change in the number of control rods with high temperature alarms.

Response to Action 1

Big Rock Point uses a 6-inch pipe to connect to its scram discharge tank (SDT) which provides the entire active scram discharge volume (SDV). The SDT includes instrumentation for level indication and automatic scram prior inadequate SDV capacity.

a. Manual scram to address scram valve leakage is not required due to the existance of the present automatic scram which provides this function.

b. Manual scram is not required as discussed above because of the automatic scram feature.

(1) The Big Rock Point design does not incorporate "rod drift-in" alarms.

(2) Big Rock Point does employ operating procedures addressing rod drive "hi-temperature" alarms.

Action 2

In addition, every BWR licensee is requested within five days of the date of this bulletin to provide and implement procedures which require a functional test using water for the instrument volume level alarm, rod block and scram switches after each scram event, before returning to power. This procedure should remain in effect until modifications in addition to Item B.1 of IE Bulletin 80-17 Supplement No 1 are completed to substantially increase reliability of water level indication in the scram discharge volume(s).

Response to Action 2

Since the requirements of Supplement No 1 to IE Bulletin No 80-17 have been met as described in our response dated August 8, 1980, the above required testing procedure following all scrams is not required. It should be noted that functional test procedures for the SDT level alarm and scram switches are currently included in the Big Rock Point surveillance program.