



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 21, 1989

Docket No. 50-155

Mr. Kenneth W. Berry
Director, Nuclear Licensing
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Berry:

SUBJECT: GENERIC LETTER 88-14 - REQUEST FOR ADDITIONAL INFORMATION
(TAC NO. 71628)

On May 24, 1989, Generic Letter 88-14 (Instrument Air) was issued requesting that each licensee review NUREG-1275, Volume 2, and perform a design and operations verification of the instrument air system. Your letter dated February 20, 1989, provided the response to the Generic Letter for Big Rock Point.

In order for the staff to adequately assess this response, additional information is requested.

Item 2 of the Generic Letter states; "Verification that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air."

Your response indicates the status to be that the post-maintenance testing and periodic surveillance testing assures that the equipment performs its intended safety function. Also several procedures are referenced dealing with loss of, or decaying instrument air system pressure and that the operators are trained in the use of these procedures. Does this status verify that maintenance practices, emergency procedures, and training are adequate to ensure that safety-related equipment will function as intended on loss of instrument air?

Item 3 states "Verification that the design of the entire instrument air system including air or other pneumatic accumulators is in accordance with its intended function, including verification by test that air-operated safety-related components will perform as expected in accordance with all design-basis events, including a loss of the normal instrument air system. This design verification should include an analysis of current air operated components failure positions to verify that they are correct for assuring required safety functions."

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Your response did not address whether an analysis of current air operated component failure positions was performed. Please verify that this analysis has been performed and that the failure positions are correct.

Please respond to this request within 90 days of receipt of this RAI.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

151

Robert M. Pulsifer, Project Manager
Project Directorate III-1
Division of Reactor Projects - III,
IV, V & Special Projects
Office of Nuclear Reactor Regulation

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Project Directorate III-1
Division of Reactor Projects - III,
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Office of Nuclear Reactor Regulation

Mr. Kenneth W. Berry
Consumers Power Company

Big Rock Point Plant

cc:

Mr. Thomas A. McNish, Secretary
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Judd L. Bacon, Esquire
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Mr. Thomas W. Elward
Plant Manager
Big Rock Point Plant
10269 U.S. 31 North
Charlevoix, Michigan 49720

Jane E. Brannon, County Clerk
County Building
Charlevoix, Michigan 49720

Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Nuclear Facilities and Environmental
Monitoring Section Office
Division of Radiological Health
P. O. Box 30035
Lansing, Michigan 48909

U.S. Nuclear Regulatory Commission
Resident Inspector Office
Big Rock Point Plant
10253 U.S. 31 North
Charlevoix, Michigan 49720