



**Consumers
Power
Company**

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COPY

September 18, 1980

Director, Nuclear Reactor Regulation
Att Mr Dennis M Crutchfield, Chief
Operating Reactors Branch No 5
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - STEAM DRUM/REACTOR
VESSEL LEVEL INSTRUMENTATION: SUBMITTAL
OF DESIGN DESCRIPTION

NRC letter dated September 13, 1979 specified requirements for plant modifications as a result of lessons learned at Three Mile Island. One modification involved the upgrading of reactor vessel and steam drum level instrumentation for detection of inadequate core cooling in BWR's (NUREG 0578 Requirement 2.1.3.b). Consumers Power Company letter dated December 27, 1979 (as revised January 18, 1980 and March 14, 1980) detailed actions to be taken at Big Rock Point in response to this NRC requirement. Consumers Power Company agreed to provide upgraded instrumentation for level monitoring and to supply a design description for NRC information. These modifications increase the level indication accuracy, but do not change level indication range. As discussed in our March 14, 1980 submittal, additional level instrumentation is being deferred pending completion of an overall risk assessment as discussed in Consumers Power Company letter dated February 22, 1980.

Attached is the System Design and Functional Description of Big Rock Point Plant Steam Drum/Reactor Vessel Level Instrument Modification, FD-CPW-002, Rev 1 prepared by Energy Incorporated. NRC letter dated October 30, 1979 identified new instrumentation as requiring design review. In view of the fact that the modifications presented in the attachment represent an upgrading of existing instrumentation, Consumers Power Company believes "implementation review" (ie, to be installed in accordance with 10 CFR 50.59 and reviewed by the NRC after installation) to be appropriate. Accordingly, NRC approval of the modification design

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Big Rock Point Plant
Steam Drum/Reactor Vessel
Level Instrumentation:
Submittal of Design Description
September 18, 1980

is not considered necessary at this time; however, prompt identification of NRC concerns, if any, would be appreciated and would minimize potential impact on the project schedule.

David P Hoffman (Signed)

David P Hoffman
Nuclear Licensing Administrator

CC JGKepler, USNRC
NRC Resident Inspector - Big Rock Point