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September 22, 1980

US NRC
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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 - PROPOSED
TECHNICAL SPECIFICATIONS CHANGE
REQUEST - FIRE PROTECTION

Consumers Power Company letter dated June 27, 1980, submitted a proposed change to the Big Rock Point Technical Specifications. The requested change was to add operability and surveillance testing requirements for fire protection equipment to be added by plant modification in accordance with the requirements of Amendment No 25 to License DPR-6. Further review has identified that the requested change is in error with respect to operability requirements for the recirculation pump sump area sprinkler system.

The change proposed by Consumers Power Company's June 27, 1980, letter added the recirculation pump sump area sprinkler system to the existing limiting condition for operation for other fire protection sprinkler systems. This requirement includes establishment of a continuous fire watch. The recirculation pump sump area is inaccessible during reactor operation due to very high radiation levels. It is thus not possible to establish a continuous fire watch in the area during power operation. Access to the area is possible during shutdown conditions, but residual radiation levels in the area are such that a continuous fire watch would cause significant personnel radiation exposure to be received; this exposure is unwarranted provided backup fire suppression equipment is available. The proposed change has been revised as shown in the attachment to this letter to resolve these problems.

Other editorial errors in our previous submittal were identified and have been corrected in the attachment. For your convenience, the attachment has been prepared as a complete package intended to supersede our June 27, 1980 request. This change has been reviewed by the Plant Review Committee and the

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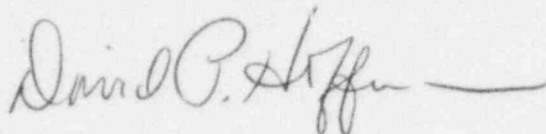
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Director, Nuclear Reactor Regulation
Big Rock Point Plant

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Safety and Audit Review Board and found acceptable. Please consider the attached proposed Technical Specifications change in lieu of that submitted June 27, 1980.

A handwritten signature in dark ink, appearing to read "David P. Hoffman", followed by a horizontal line.

David P Hoffman
Nuclear Licensing Administrator

CC Director, Region III, USNRC
NRC Resident Inspector-Big Rock Point

Attachment