



Consumers
Power
Company

COPY

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

February 5, 1975

Division of Reactor Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket 50-1.5
License DPR-6
Big Rock Point Plant

Gentlemen:

On November 1, 1974, Consumers Power Company submitted a request for change to the Technical Specifications of License DPR-6 and requested permission to conduct a special test. The special test was requested to obtain additional information necessary to support the application for the Technical Specifications Change. The change requested deletion of the minimum withdrawal time of 23 seconds for control rod drives.

Permission to perform the special test was requested not because the test was deemed to involve an unreviewed safety question as defined in 10 CFR 50.59, but rather because of a question with regard to interpretation of the Technical Specifications. In fact, as stated at the bottom of Page 2, both the SARB and PRC, by review and approval of the proposed Technical Specifications Change submitted November 1, 1974 agreed with the conclusion that "The performance of this test would constitute neither an unreviewed safety question nor a significant hazards consideration." The request for permission to perform the special test was submitted because several members of our staff argued that the definitions provided in the Technical Specifications for "shutdown," "cold shutdown" and "power operation" implied that performance of the test would constitute deliberate violation of a Technical Specifications limit (23-second withdrawal time) during power operation. The conditions of "shutdown" and "cold shutdown" are defined in the Technical Specifications as being shutdown conditions at less than 212°F. The definition of power operation is anything other than "shutdown" or "cold shutdown." These members of the staff well understood that the plant could be and often is in a shutdown condition with primary coolant temperatures with greater than 212°F but nonetheless were concerned of the strict literal interpretation of the definition of "power operation."

Since submittal of the proposed Technical Specifications Change Request and the request to perform the test, discussions with members of your staff have revealed that we are needlessly concerned with the "strict literal interpretation" of the definition of "power operation." The NRC staff recognizes that the reactor can be in a shutdown condition above 212°F,

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even with one rod fully withdrawn to perform such a test. Consumers Power Company also recognizes this as evidenced by our conclusion that an unreviewed safety question would not exist. Further, similar tests are performed with the exception of the maximum withdrawal rate at six-month intervals when the drives are timed individually in a hot condition. It is interesting to note that at the present time more shutdown margin exists with one rod fully withdrawn in a hot condition than existed with one rod fully withdrawn in a cold condition at the time the maximum withdrawal rate in the cold condition was measured.

As discussed with members of the NRC staff, it has been concluded that special permission to perform the test is not required and, therefore, we withdraw our November 1, 1974 request for permission to perform the test. The test will be performed in the hot condition with all rods excepting the one being tested fully inserted. A second licensed operator will be stationed to observe the rod withdrawal and ensure that test procedures are being followed.

The data obtained from this test will be submitted in support of our request for deletion of the 23-second withdrawal time limit.

Yours very truly,

Ralph B. Sewell (Signed)

RBS/map

Ralph B. Sewell
Nuclear Licensing Administrator

CC: JGKeppler,
USNRC

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(TEMPORARY FORM)

CONTROL NO: 2456

FILE: _____

FROM: Consumers Power Co. Jackson, Michigan Ralph B. Sewell		DATE OF DOC 2-28-75	DATE REC'D 3-5-75	LTR XXXX	TWX	RPT	OTHER
TO: Division of Reactor Licensing		ORIG 1-signed	CC	OTHER	SENT AEC PDR <u>XXXXX</u> SENT LOCAL PDR <u>XXXX</u>		
CLASS	UNCLASS XXXX	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-155		
DESCRIPTION: Ltr ref their 2-5-75 ltr trans the following:				ENCLOSURES: Ltr dated Feb. 3, 1975 requesting withdrawal of there Nov 1, 1974 request for change of Tech- Specs.....			
PLANT NAME: Big Rock Point							

FOR ACTION/INFORMATION 3-5-75 JGB

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