

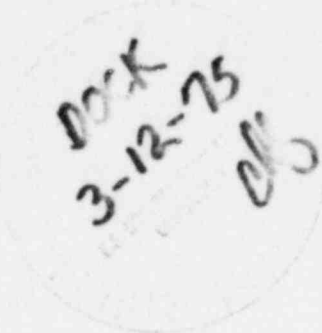


Consumers
Power
Company

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



March 10, 1975



Re: Docket 50-155
License DPR-6
Big Rock Point
Tech Specs
Change Request

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

Gentlemen:

On August 15, 1974 Consumers Power Company submitted a report entitled, "Big Rock Point Plant Reactor Depressurization System Description, Operation and Performance Analysis." At the time that report was submitted, Section 8.2, Periodic Testing, was not included as it had not been completed. A testing program has now been developed. The proposed testing is incorporated in the attached request for change to the Technical Specifications of License DPR-6, Docket 50-155. Three (3) executed and thirty-seven (37) conformed copies of this request are herewith transmitted.

During conversations in the fall 1974 with a member of the Regulatory staff, a question was asked regarding the consequences of inadvertent blowdown through a 1-1/2 inch bypass line that is included in the system. Inadvertent blowdown through this bypass line would result in a blowdown rate of approximately seven (7) pounds per second at normal operating pressures and temperatures. Consumers Power Company has calculated that for a five (5) minute duration blowdown the dose due to Iodine 131 (milk) would be approximately 35 mRem. Similarly, the outside exposure calculated due to noble gases (receptor at site boundary) is about 25 mRem for a five (5) hour duration of release. Both dose calculations assumed primary coolant activity levels were at the Technical Specifications limits.

The August 5 determination, regarding a variance from the requirements of the Interim Acceptance Criteria, provided an extension of time until March 1, 1976 for installation of the RDS system at the Big Rock Point Plant and required reporting of the results of an investigation into means for improving ECCS reliability, including provisions for manual depressurization of the primary coolant system. In addition, it also required Consumers Power Company to report periodically, but not less than once every three (3) months, its efforts in attempting to achieve compliance with the IAC. By letters dated October 31, 1974 and December 30, 1974, Consumers Power Company reported its efforts to achieve compliance with the IAC. In addition, both letters described the results of investigations of other methods for

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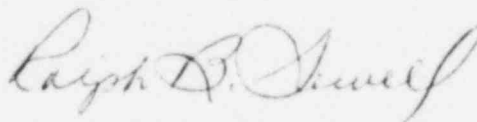
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improving ECCS reliability, including interim provisions for manual depressurization of the primary coolant system. As a further update, the manual actuation system (manual depressurization of the primary coolant system) preliminary engineering studies have been completed to a point where a manual actuation system can be installed during fall 1975 if the automatic actuation system is not available. Since we presently have confidence that the automatic actuation system will be available in the fall of 1975, we have discontinued engineering work upon the manual actuation system. This work will be started on a schedule which will allow installation during fall 1975 if the fabrication and delivery schedule of the automatic actuation system is delayed beyond the fall of 1975.

In addition, our December 30, 1974 letter stated that we were reviewing the August 15, 1974 report, "Big Rock Point Plant Reactor Depressurization System Description, Operation and Performance Analysis" to determine if the change in actuation system vendor necessitated significant revision to the report. We have not completed this review. We will advise the Regulatory staff when this review is complete.

Yours very truly,



Ralph B. Sewell
Nuclear Licensing Administrator

RBS/ce

CC: JGKepler, USNRC

CONSUMERS POWER COMPANY

Docket 50-155

Request for Change to the Technical Specifications

License DPR-6

The following changes to the Technical Specifications of License DPR-6 issued to Consumers Power Company on May 1, 1964 for the Big Rock Point Plant are requested:

I. Changes

- A. Incorporate the attached Section 3.1.5.
- B. Insert the attached "Tables 3.5.2.h and 4.5.2.h."

II. Discussion

Following analysis of the Big Rock Point Plant to demonstrate conformance with the Interim Acceptance Criteria, it was recognized that modifications to existing plant systems were required. Several modifications were evaluated and the installation of a reactor depressurization system was selected as the most desirable course of action. A detailed description of this modification was submitted August 15, 1974. This report was titled, "Big Rock Point Plant Reactor Depressurization System Description, Operation and Performance Analysis." This report provides the basis of this Technical Specifications change.

III. Conclusion

Following review of the proposed Technical Specifications for the reactor depressurization system, the SARB has concluded that these specifications are appropriate to govern operations of the RDS and will not result in a significant increased risk to the public health and safety.

CONSUMERS POWER COMPANY

By R. A. Lamley
R. A. Lamley, Vice President

Sworn and subscribed to before me this 10th day of March 1975.

Sylvia B. Ball
Sylvia B. Ball, Notary Public
Jackson County, Michigan
My commission expires May 18, 1976.