Regulatory



Consumers Power Company

General Offices: 212 West Michigan Avenue. Jackson. Michigan 49201 • Area Code 517 788-0550 November 28, 1972

File Cy.

Mr. John F. O'Leary, Director Directorate of Licensing United States Atomic Energy Commission Washington, DC 20545 Re: Docket No 50-155 License DPR-6 Proposed Technical Specification Change 35

Dear Mr. O'Leary:

Transmitted herewith are three (3) executed and thirtyseven (37) conformed copies of a request for a change to the Technical Specifications of License DPR-6, Docket No 50-155, issued to Consumers Power Company on May 1, 1964 for the Big Rock Point Nuclear Plant.

This proposed change (No 35) will incorporate the Big Rock Point Plant reporting requirements program into the Technical Specifications as requested in Mr. Donald J. Skovholt's letter of September 28, 1972.

Yours very truly,

Robert L. Haueter Electric Production Superintendent - Nuclear

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JR/dmb





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#### CONSUMERS POWER COMPANY

Docket No 50-155

Received with Loved 11-28-72

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Request for Change to the Technical Specifications

Change No 35

License DPR-6

For the reasons hereinafter set forth, the following changes to the Technical Specifications of License DPR-6, Docket No 50-155, issued to Consumers Power Company on May 1, 1964 for the Big Rock Point Nuclear Plant are requested:

I. Section 7

Add the following paragraphs to Section 7 to read as follows: "7.2.2.1 PLANT REPORTING REQUIREMENTS

7.2.2.1.1 The following information shall be submitted in addition to the reports listed in Table 7.2.2.1-1 and required by Title 10, Code of Federal Regulations.

7.2.2.1.2 Routine Reports:

a. Operating Reports

Operating Reports shall be submitted in writing to the Deputy Director for Reactor Projects, Directorate of Licensing, USAEC, Washington, DC 20545.

(1) <u>Semiannual Operating Reports</u>

Routine operating reports shall be submitted within 60 days after January 1 and July 1 of each year. These reports should include the following:

(a) Operations Summary

A summary of operating experience occurring during the reporting period that relates to the safe operation of the plant, including a summary of:

(i) changes in plant design;

(ii) performance characteristics (eg, equipment and fuel performance);

(iii) changes in procedures which were necessitated by(i) and (ii) or which otherwise were required to improve the safety of facility operations;

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(iv) results of surveillance tests and inspections required by these Technical Specifications;

(v) the results of any periodic containment leak rate tests performed during the reporting period;

(vi) a brief summary of those changes, tests and experiments requiring authorization from the Commission pursuant to10 CFR 50.59(a); and

(vii) any changes in the plant operating organization which involve positions which are designated as key supervisory personnel consisting of the following: Plant Superintendent, Assistant Plant Superintendent, Technical Engineer, QA Engineer, Maintenance Supervisor, Instrument and Control Supervisor, Reactor Engineer and Chem and Radiation Protection Supervisor.

(b) Power Generation

A summary of power generated during the reporting period including:

(i) gross thermal power generated (in MWh);

(ii) gross electrical power generated (in MWh);

(iii) net electrical power generated (in MWh);

(iv) number of hours the reactor was critical;

(v) number of hours the generator was on-line; and

(vi) histogram of thermal power vs time.

(c) Shutdowns

Descriptive material covering all outages occurring during the reporting period. For each outage, information shall be provided on:

(i) the cause of the outage;

(ii) the method of shutting down the reactor (eg, trip automatic rundown, or manually controlled deliberate shutdown);

(iii) duration of the outage;

(iv) unit status during the outage (eg, cold shutdown or hot shutdown); and

(v) corrective action taken to prevent repetition, if appropriate.

#### (d) Maintenance

A discussion of safety-related maintenance (excluding preventative maintenance) performed during the reporting period on systems and components that are designated to prevent or mitigate the consequences of postulated accidents or to prevent the release of significant amounts of radioactive material. Included in this category are systems and components which are part of the reactor coolant pressure boundary defined in 10 CFR 550.2(v), any part of the engineered safety features, or associated service and control systems that are required for the normal operation of engineered safety features, part of any reactor protection or shutdown system, or part of any radioactive waste treatment handling and disposal system or other system which may contain significant amounts of radioactive material. For any malfunctions for which corrective maintenance was required, information shall be provided on:

- (i) the system or component involved;
- (ii) the cause of malfunction;
- (iii) the results and effect on safe operation;
- (iv) corrective action taken to prevent repetition; and

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(v) precautions taken to provide for reactor safety

during repair.

### (e) Changes, Tests and Experiments

A summary of all changes in the plant design and procedures that relate to the safe operation of the plant shall be included in the Operations Summary section of the semiannual reports. Changes, tests and experiments performed during the porting period that require authorization from the Commission I is and in 20 CFR 50.59(a) are covered in Paragraph 7.2.2.1.2(1)(a) of these Technical Specifications; however, those changes, tests and experiments that do not require Commission authorization pursuant to \$50.59(a) shall be addressed. The report shall include a brief description and the summary of the safety evaluation for those changes, tests and experiments carried out without prior Commission approval, pursuant to the requirements of \$50.59(b) of the Commission's regulations, that 'The licensee shall furnish to the Commission, annually or at such shorter intervals as may be specified in the license, a report containing a brief description of such changes, tests and experiments, including a summary of the safety evaluation of each.'

(f) Radioactive Effluent Releases

A statement of the quantities of radioactive effluents released from the plant, with data summarized on a monthly basis following the general format of Appendix A of USAEC Safety Guide 21 of January 1972:

(i) Gaseous Effluents

(a) Gross Radioactivity Releases

(1) Total gross radioactivity (in curies),

including noble and activation gases released.

(2) Maximum gross radioactivity release rate during any one-hour period.

(3) Total gross radioactivity (in curies)

by nuclide released, based on representative isotopic analyses performed.

(4) Percent of technical specification limit.

(b) Iodine Releases

(1) Total iodine radioactivity (in curies)

by muclide released, based on representative isotopic analyses performed. (2) Percent of technical specification limit

for I-131 released.

(c) Particulate Releases

(1) Gross radioactivity ( $\beta$ ,  $\gamma$ ) released (in curies) excluding background radioactivity.

(2) Gross alpha radioactivity released (in curies) excluding background radioactivity.

(3) Total gross radioactivity (in curies) of nuclides with half-lives greater than eight days.

(4) Percent of technical specification limit for particulate radioactivity with half-lives greater than eight days.

(ii) Liquid Effluents

(a) Gross radioactivity ( $\beta$ ,  $\gamma$ ) released (in curies) excluding tritium and average concentration released to the unrestricted area.

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(b) Total tritium and alpha radioactivity (in curies) released and average concentration released to the unrestricted area.

(c) Total dissolved gas radioactivity (in curies) and average concentration released to the unrestricted area.

(d) Total volume (in liters) of liquid waste released.

(e) Total volume (in liters) of dilution water used prior to release from the restricted area.

(f) The maximum concentration of gross radioactivity ( $\beta$ ,  $\gamma$ ) released to the unrestricted area (averaged over the period of release).

(g) Total gross radioactivity (in curies) by nuclide released, based on representative isotopic analyses performed.

(h) Percent of technical specification limit and10 CFR Part 20 concentration limits for unrestricted areas.

(iii) Solid Waste

(a) The total amount of solid waste packaged

(in cubic feet).

(b) The total estimated radioactivity (in curies)

involved.

(c) The dates of shipment and disposition (if

shipped off-site).

(g) Environmental Monitoring

(i) For each medium sampled, eg, air, sediment, surface water, soil or fish including:

(a) Number of sampling locations.

(b) Total number of samples.

(c) Number of locations at which levels are found to be significantly above local backgrounds.

(d) Highest, lowest and the annual average concentrations or levels of radiation for the sampling point with the highest average and description of the location of that point with respect to the site.

(ii) If levels of radioactive materials in environmental media indicate the likelihood of public intakes in excess of 5% of those that could result from continuous exposure to the concentration values listed in Appendix B, Table II, Part 20, estimates of the likely resultant exposure to individuals and to population groups, and assumptions upon which estimates are based shall be provided.

(iii) If statistically significant variations of off-site environmental concentrations with time are observed, correlation of these results with effluent release shall be provided.

(h) Occupational Personnel Radiation Exposure

A tabulation of personnel exposures shall be reported for the year in the following groups: less than 100 mRem, 100 - 500 mRem, 500 - 1250 mRem, 1250 - 2500 mRem, 2500 - 5000 mRem, above 5000 mRem. 7.2.2.1.3 Nonroutine Reports

a. Reporting of Abnormal Events

(1) Abnormal Occurrence Reports

Notification shall be made within 24 hours by telephone or telegraph to the Director of the Regional Regulatory Operations Office, followed by a written report within 10 days to the Deputy Director for Reactor Projects, Directorate of Licensing (CC to the Director of the Regional Regulatory Operations Office) in the event of the abnormal occurrences as defined:

(a) Conditions that result in exceeding a safety limit or that result in safety systems settings less conservative than the limiting safety system setting, or that result in violation of a limiting condition for operations established in the Technical Specifications.

(b) Abnormal degradation of one of the several boundaries which are designed to contain radioactive materials, or any unplanned release of radioactive material.

(c) Uncontrolled or unanticipated changes in reactivity which could significantly affect safety of operations.

(d) Incidents or conditions which prevented or could have prevented the performance of the intended safety function of an engineered safety feature or of the reactor protection system.

The written report on these abnormal occurrences, and to the extent possible, the prediminary telephone and telegraph notification, shall: (a) describe, and we and evaluate safety implications, (b) outline the measures taken to assure that the cause of the condition is determined, and (c) indicate the corrective action (including any changes made to the procedures and to the quality assurance program) taken to prevent repetition of the occurrence and of similar occurrences involving similar components or systems.

In addition, the written report shall relate any failures or degraded performance of systems and components for the incident to similar equipment failures that may have previously occurred at the plant. The evaluation of the safety implications of the incident should consider the cumulative experience obtained from the record of previous failures and malfunctions of the affected systems and components or of similar equipment.

b. Reporting of Unusual Events

A written report shall be forwarded within 30 days to the Deputy Director for Reactor Projects, Directorate of Licensing, and to the Director of the Regional Regulatory Operations Office, in the event of:

(1) Discovery of any substantial errors in the transient or accident analyses, or in the methods used for such analyses, as described in the Final Hazards Summary Report or in the bases for the Technical Specifications.

(2) Any substantial variance from performance specifications contained in the Technical Specifications or in the Final Hazards Summary Report.

(3) Any condition involving a possible single failure which, for a system designed against assumed single failures, could result in a loss of the capability of the system to perform its safety function.

7.2.2.1.4 Special Reports

Special reports shall be submitted in writing within 90 days to the Deputy Director for Reactor Projects, Directorate of Licensing, USAEC, Washington, DC 20545.

Special reports shall be submitted covering inspections, tests and maintenance that are appropriate to assure safe operation of the plant. The frequency and content of these special reports are determined on an individual case basis and designated in these Technical Specifications. Examples of subjects for such reports include:

(a) Authorization of changes, tests, and experiments in accordance with 10 CFR 50.59 analyzed as an unreviewed safety question.

(b) Containment leak rate tests.

Table 7.2.2.1-1 as attached includes additional items that are to be reported as specified in their respective sections of the Code of Federal Regulations."

CONSUMERS POWER COMPANY

K. J Finley Vice President J

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Date: November 28, 1972

Sworn and subscribed to before me this 28th day of November 1972.

Marian J. Van alben Notary Public, Jockson County, Michigan

My commission expires October 14, 1973

## TABLE 7.2.2.1-1

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Reporting Summary

AEC Regulation	Report
20.403(a)	Severe Accident Involving Licensed Material
20.402	Loss of Licensed Material
73.42	Special Nuclear Material Un- accounted for
40.64(c)	Theft of Unlawful Diversion of Source Material
70.52	Accidental Criticality or Loss of Special Nuclear Material
70.54	Transfer of Special Nuclear Material
40.64(a)	Transfer of Source Material
20.403(Ъ)	Accidents Involving Licensed Material
20.405(a)	Overexposure or Excessive Radiation Level
20.408	Personnel Exposure (Termin- ated Employees)
70.53	Special Nuclear Material Status

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AEC PDR OGC, ROOM P-506A AUNTZING/STAFF CASE GIAMBUSSO BOYD-L(BWR) DEYOUNG-L(PWR) OKOVHOLT-L P. COLLINS EEG OPR FILE & REGION (2) MORRIS STELLE 1-LOCAL PDR -DTIE(ABERNATHY) 1-NSIC(BUCHANAN) 1-ASLB-YORE/SAYRE WOODWAFD/H. ST.	HENDRIE SCHROEDER MACCARY LANGE(2) PAWLICKI SHAO KNUTH STELLO MOORE HOUSTON TEDESCO LONG LAINAS BENAROYA	DENTON GRIMES GAMMILL KASTNER BALLARD SPANGLER ENVIRO MULLER DICKER KNIGHTON YOUNGBLOOD PROJ LEADER REGAN EXTERNAL DISTI	F & 1 SMTL NUSS LIC A SERV MASON WILSO MAIGI SMITH GEAR R DIGGS TEETS LEE RIBUTION	ASST. ASST. ASST. ASST. ASST. ICE L N L N L N L N L L L L DN L L L L DN L L L DN L L L DN L L L DN L L DN L L DN L L DN L DN DN D	SHAF BROW G. W E. G A/T BRAI SALT PLAN MCDO DUBE INFO C. M R GI 1-PDR- 1-GERA BROO	ER N TILLIAM OULEOUI IND TMAN ZMAN S NALD ILES RIGI SAN/LA/ LD LELI KHAVEN	F & M E S E RNE L NE L NAL NY LOUCHE NAT. LAB
AEC PDR OGC, ROOM P-506A MUNTZING/STAFF CASE GIAMBUSSO BOYD-L(BWR) DEYOUNG-L(PWR) OKOVHOLT-L P. COLLINS EEG OPR FILE & REGION (2) MORRIS STELLE	HENDRIE SCHROEDER MACCARY LANGE(2) PAWLICKI SHAO KNUTH STELLO MOORE HOUSTON TEDESCO LONG LAINAS	DENTON GRIMES GAMMILL KASTNER BALLARD SPANGLER ENVIRO MULLER DICKER KNIGHTON YOUNCBLOOD PROJ LEADEN REGAN EXTERNAL DISTI (1)(5)(9)-NAT: 1-R. ( 1-R. ( 1-CONS ASST. NEW	F & 1 SMTL NUSS LIC A SERV MASON WILSO MAIGE SMITH GEAR SMITH GEAR LEE RIBUTION IONAL LAB'S CARROLL-OC, ( CATLIN, E-256	ASST. ASST. ASST. ASST. ICE L N L N L AST L H L IN L S L L POO POO T-B227 -GT	SHAF BROW G. W E. G A/T BRAI SALT PLAN MCDO DUBE INFO C. M R OI 1-PDR- 1-GERA BROO 1-AGMEN	ER N TILLIAM OULEOUI IND TMAN ZMAN S NALD ILES RIGI SAN/LA/ LD LELI KHAVEN	F & M E S E BNE L NE L NAT. LAB IN KOESTER