



Regulatory

F. 3



Consumers Power Company

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

July 19, 1974



Mr. John F. O'Leary, Director  
Directorate of Licensing  
US Atomic Energy Commission  
Washington, DC 20545

Re: Docket 50-155  
License DPR-6  
Big Rock Point

Dear Mr. O'Leary:

By letter dated May 1, 1974, Consumers Power Company submitted additional information concerning the "as-found" control rod withdrawal times of seven (7) of the thirty-two (32) Big Rock Point control rod drives being less than the 23-second withdrawal limit required by the Technical Specifications (AO-3-74). The letter described temporary measures that were being implemented to reduce the probability of exceeding the 23-second withdrawal specification in the hot condition. Since that time, the Safety Audit and Review Board has performed another review and recommended other temporary corrective action which they believe to be more appropriate than that stated in the May 1, 1974 letter.

The May 1, 1974 letter stated in part: "To reduce the probability of exceeding the 23-second withdrawal specification in the hot condition, the withdrawal rates will first be set in the cold condition and at the slowest rate possible to maintain proper operation (approximately 36 seconds). Following the heat-up to the hot condition, the drives will then be inserted and the withdrawal rate on each drive checked. Any control rod drive that withdraws faster than 25 seconds will be adjusted to withdraw slower to account for minor hydraulic system changes. This test will be conducted each time the reactor is started up from either a cold condition or a hot standby condition until either a proposed Technical Specifications change is submitted and approved to reduce the 23-second withdrawal time or a modification of the existing system is performed that enhances its ability to meet the 23-second withdrawal time requirement with a less rigorous surveillance and timing program."

The hot standby start-up accident is the accident which establishes the 23-second withdrawal limit. The accident, as described in the FHSR, assumes an error in which the operator withdraws an off-standard sequence of control rods in a local grouping which maximizes control rod worth. Then, at that time, the strongest control rod in worth is continuously withdrawn (due to operator error in positioning the jog-run switch) at the rate of three (3) inches per second (23 seconds total withdrawal time).

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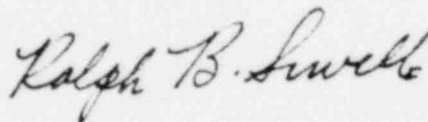
As the start-up accident is based on an operator error which causes the continuous withdrawal of the control rod, the Safety Audit and Review Board concluded that if the physical ability to continuously withdraw the control rod is removed, the 23-second withdrawal limit for continuous motion would not be a concern. It is physically impossible to move a drive from the fully inserted position to the fully withdrawn position in the jog mode of operation in less than 23 seconds. Therefore, the Safety and Audit Review Board concluded that if the jog-run switch were disabled, the need for the temporary additional timing surveillance specified in the May 1, 1974 letter would no longer be required. This action is also considered to be a temporary measure until permanent action as described in the May 1, 1974 letter can be taken.

The disabling of the switch will be accomplished by lifting and insulating lead 1 on the 1/1T contacts of the control rod positioning jog-run 4S5 switch. This lead will be lifted at all plant operating conditions except when the plant is in the cold shutdown condition. The lead will be lifted, insulated and tagged in accordance with appropriate plant administrative procedures. The lead will be reinstalled in the cold shutdown condition as necessary to allow continuous withdrawal timing and testing of the control rod drives. This testing is performed to establish proper jogging operation following maintenance or to fulfill Technical Specifications testing requirements at six-month intervals.

Based on the modification described above to temporarily disable the jog-run switch in the jog mode during all conditions except the cold shutdown condition, the Big Rock Point Plant Review Committee and the Safety Audit and Review Board have concluded that this modification does not involve an unreviewed safety question nor require a Technical Specifications change.

As described in the May 1, 1974 letter, analysis is being performed to justify reduction of the 23-second withdrawal time. This analysis has not yet been completed. When this analysis is completed and if the results are acceptable, a proposed Technical Specifications change will be submitted.

Yours very truly,



Ralph B. Sewell  
Nuclear Licensing Administrator

RBS/ds

CC: JGKepler,  
USAEC