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

July 28, 1978

Director of Nuclear Reactor Regulation Att: Mr Don K Davis, Acting Branch Chief Operating Reactors Branch No 2 US Nuclear Regulatory Commission Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - T/S CHANGE REQUEST: INCREASING ROD SPEED SURVEILLANCE INTERVAL

Transmitted herewith are three (3) original and thirty-seven (37) conformed copies of a proposed change to the Technical Specifications of the Big Rose Point Plant, Docket 50-155, License DPR-6.

The purpose of this change is to increase the required time interval to perform rod withdrawal timing tests. Approval of this Technical Specifications change request is necessary to prevent a forced outage necessitated by the current Technical Specifications rod withdrawal timing surveillance requirements. As such, approval of this test is required by September 1, 1978. It should be noted that submittal of this change in no way supersedes or replaces the Technical Specifications change request dated November 1, 1974. This submittal provided justification for the deletion of the rod withdrawal timing surveillance and limitations and has not yet received staff review.

It is determined that this change request qualifies as a Class III Amendment since there is a single safety issue under consideration. A check for the appropriate amount is attached.

David A Bixel

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Nuclear Licensing Administrator

CC: JGKeppler, USNRC

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CONSUMERS POWER COMPANY Docket 50-155 Request for Change to the Technical Specifications License DPR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in Facility Operating License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964 for the Big Rock Point Plant be changed as described in Section I below:

I. Change

A. Change the periodicity of Section 5.2.2(a)(i) from "during each major refueling shutdown and at least once every six months during periods of power operation" to "each major refueling."

NOTE: Corrected Technical Specifications are attached.

II. Discussion

By letter dated July 19, 1974, Consumers Power Company described temporary corrective action implemented at Big Rock Point to eliminate the possibility of exceeding the 23-second control rod withdrawal time limit of Technical Specification Section 5.2.2(a)(i). This temporary measure involved lifting and insulating Lead 1 on the 1/1T contacts of the control rod positioning jog-run 485 switch, disabling the ability to withdraw control rods in the continuous run mode. The continuous run mode is only reenabled during periods when the reactor is in the shutdown condition, primarily to perform control rod drive surveillance testing requirements of Section 5.2.2(a). A Technical Specifications change request was submitted to the NRC on November 1, 1974 to delete the minimum continuous rod withdrawal rate limit and eliminate the need to disable the continuous run feature. As of this date, this Technical Specifications revision has not been approved and the temporary measures eliminating continuous run remain in effect.

The control rod drive surveillance tests required by Section 5.2.2(a) become due once again during the first week of September 1978. These tests are currently planned to be performed during power operation. Since the ability to test and time continuous withdrawal is no longer

possible because of the controls in effect, relief from Section 5.2.2(a)(i) will be required. It is requested that the surveillance interval for timing continuous withdrawal be changed from every six months to each major refueling outage.

The temporary measures controlling the continuous run feature will remain in effect during power operation precluding the possibility of exceeding the existing 23-second withdrawal limit. Once approved, the Technical Specifications request of November 1, 1974 will eliminate the concern of excessive withdrawal speeds and bring Big Rock Point Technical Specifications in line with current BWR Standard Technical Specifications which require no surveillance of this type.

It is requested that this change be approved by September 1, 1978 to prevent a forced outage necessitated by the current Technical Specifications rod withdrawal timing surveillance requirements.

III. Conclusion

Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have concluded that this change is acceptable from a safety standpoint.

CONSUMERS POWER COMPANY

R C Youngdahl , Executiv

xecutive Vice President

Sworn and subscribed to before me this 28th day of July 1978.

Linda R Thayer, Notary Public

Jackson County, Michigan

My commission expires Tuly 9, 1979

E01/31/28

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DOCTYPE: LETTER NOTARIZED: NO

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LTR 3 ENCL 40 FORWARDING LIC NO DPR-6 APPL FOR AMEND: TECH SPEC PROPOSED CHANGE CONCERNING

INCREASING THE REQUIRED TIME INTERVAL TO PERFORM ROD WITHDRAWAL TIMING

TESTS. . . NOTARIZED 07/28/78. . . W/ATT LIC FEES.

PLANT NAME: BIG ROCK PT

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