



Consumers
Power
Company

REGULATORY DOCKET FILE COPY

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

July 27, 1978

Rec'd 08/01/78

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 - TECHNICAL
SPECIFICATIONS CHANGE REQUEST: ISI

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

The purpose of this submittal is to incorporate the provisions of 10 CFR 50.55a(g) into the Big Rock Point Technical Specifications. Since the changes involve a single safety issue and reflect a current NRC position, it is concluded that the proposal should be defined as a Class III amendment. A check for the appropriate amount is attached.

This change should be effective at the completion of Inservice Inspection No 6 which is approximately February 1, 1979.

David A Bixel
Nuclear Licensing Administrator

CC: JGKepler, 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. Changes

1. Replace "every 12 months" in Sections 3.7.b and 3.7.c with "each reactor shutdown for refueling but in no case at intervals greater than two years."
2. Delete Sections 9.1, 9.2, 9.3 and 9.4, and Tables 9.3(a) and 9.3(b). Replace these with new Sections 9.1, 9.2, 9.3 and 9.4 as follows:

9.0 PRIMARY SYSTEM SURVEILLANCE

9.1 APPLICABILITY

Applies to preoperational and inservice structural surveillance of the reactor vessel and other Class 1, Class 2 and Class 3 system components.

9.2 OBJECTIVE

To insure the integrity of the Class 1, Class 2 and Class 3 piping systems and components.

9.3 SPECIFICATIONS

- a. The structural integrity of ASME Classes 1, 2 and 3 components, as determined by 10 CFR 50, Section 50.55a, shall be verified and maintained at an acceptable level in accordance with Section XI of the ASME B&PV Code with applicable addenda as required by 10 CFR 50, Section 50.55a(g), except where specific relief has been granted by the NRC.
- b. Inservice testing of ASME Classes 1, 2 and 3 pumps and valves, as determined by 10 CFR 50, Section 50.55a, shall be performed in accordance with Section XI of the ASME B&PV Code with applicable addenda as required by 10 CFR 50, Section 50.55a(g), except where specific relief has been granted by the NRC, and where provisions of Sections 11.4.1.4, 4.1.5 and 11.4.3.4 take precedence.

- c. Sufficient records of each inspection shall be kept to allow comparison and evaluation of future tests. (See also Sections 6.9.4 and 6.10.2.g.)
- d. The inservice inspection program shall be reevaluated as required by 10 CFR 50, Section 50.55a(g)(5) to consider incorporation of new inspection techniques that have been proven practical, and the conclusions of the evaluation shall be used as appropriate to update the inspection program.
- e. A surveillance program to monitor radiation induced changes in the mechanical and impact properties of the reactor vessel materials shall be maintained as described in Section 4.1.1(h) of these Technical Specifications.

9.k BASIS

The inspection program implements Section XI of the ASME Boiler and Pressure Vessel Code to the maximum extent practical. It is recognized that plant design and construction were completed approximately seven years prior to the development of Section XI and it is, therefore, not possible to comply fully with the code.

- 3. Delete Section 4.1.2(c)3.
- 4. Under Reactor Depressurization System, change Section 4.1.5.A to read as follows:
 - "A. The isolation valves shall be test-operated at least once every three months "

NOTE: Corrected Technical Specifications pages are attached.

II. Discussion

Proposed Change 1 to the Big Rock Point Technical Specifications would simply change the surveillance interval for specific integrated leak rate tests from every 12 months to each reactor refueling (not to exceed intervals greater than two years). This change would make the Technical Specifications wording consistent with Section XI of the Boiler and Pressure Vessel Code and with the criteria of 10 CFR 50, Appendix J.

The proposed Change 2 to the Big Rock Point Technical Specifications reflects the wording and intent of your letters of April 28, 1976, November 24, 1976 and January 16, 1978 pertaining to inservice inspection requirements.

In general, proposed Sections 9.1 and 9.2 deal with the upgrading of the Technical Specifications, incorporating Class 2 and Class 3 systems into the inservice structural surveillance program as required by 10 CFR 50.55a(g).

Section 9.3.a has been altered to require updating inspection programs to the applicable addenda of Section XI of the ASME Boiler and Pressure Vessel Codes. Section 9.3.b reflects the augmentation of a pump and valve program into the primary system surveillance program. Finally, Section 9.3.d has been added to comply with the requirements of 10 CFR 50.55a(g) requiring periodic updating of the inservice inspection program based upon new inspection techniques that have proven to be practical.

Since a submittal requesting relief from specific code requirements and containing a description of the planned inservice inspection and testing programs will be developed, all references to code relief and testing and inspection methodology have been deleted from the current Big Rock Point Technical Specifications. This is consistent with the intent of having the mechanics of the approved plan independent of the Technical Specifications and thereby simplifying the process for incorporating changes.

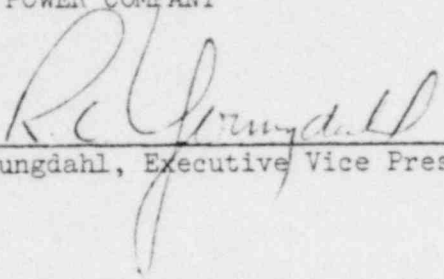
One final change that is incorporated in the proposed Technical Specifications changes is that deleting augmented interim surveillance requirements for high energy lines. This interim surveillance program was incorporated in Amendment 8 to the Big Rock Point Technical Specifications dated November 11, 1974 and was intended to remain in effect until the modifications described in our letter of June 29, 1973 were completed. Since these modifications have been completed and documented (reference the Big Rock Point 1976 Annual Report dated February 25, 1977), it is requested that the interim surveillance requirements be deleted, and that surveillance required by the inservice inspection program be resumed.

III. Conclusion

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

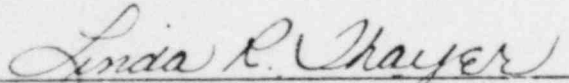
CONSUMERS POWER COMPANY

By



R C Youngdahl, Executive Vice President

Sworn and subscribed to before me this 27th day of July 1978.



Linda R Thayer, Notary Public

Jackson County, Michigan

My commission expires July 9, 1979.

Ec 101/78

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50-155

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SUBJECT: LTR 1 ENCL 1

FORWARDING LIC NO DPR-6 APPL FOR AMEND: TECH SPEC PROPOSED CHANGE CONCERNING
REVISION TO THE PRIMARY SYSTEM SURVEILLANCE, APPLICABLE TO PREOPERATIONAL AND
INSVC STRUCTURAL SURVEILLANCE OF THE REACTOR VESSEL AND OTHER CLASS 1, 2, & 3
SYSTEM COMPONENTS. . . NOTARIZED 7/27/78

PLANT NAME: BIG ROCK PT

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