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December 20, 1977

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 FOINT PLANT - REQUEST FOR EXEMPTION FROM 10 CFR 50 APPENDIX J, SECTION II.G.1

By letter dated August 5, 1975, Consumers Power Company was requested to determine the extent of compliance with 10 CFR 50 Appendix J and to submit appropriate Technical Specifications changes and, where applicable, request exemption from specific criteria. In response, Consumers Power Company submitted both Technical Specifications changes and, under 10 CFR 50.12, requests for exemption. Further evaluation of our requests for exemption has revealed that additional relief from the requirements of 10 CFR 50 Appendix J is necessary. Specifically, an exemption is required from the provisions that require local leak testing of containment piping penetrations fitted with expansion bellows.

The Big Rock Point Plant utilizes an expansion bellows seal on five penetrations: Reactor feed-water line, main steam line, service water supply and return lines, and space heating supply line. These are single bellows that are not designed to permit local leak rate testing. An annual visual inspections of these penetrations is conducted in conformance with the Big Rock Point Technical Specifications and the performance of the penetration bellows is tested during the containment integrated leak rate tests. Thus, pursuant to the provisions of 10 CFR 50.12, Consumers Power Company requests exemption from the requirements of 10 CFR 50 Appendix J, Section II.G.1 that specify conducting local leak rate testing on containment piping penetrations that are fitted with expansion bellows.

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David A Bixel 7 Nuclear Licensing Administrator

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CC: JGKeppler, USNRC

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