



Consumers
Power
Company

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May 17, 1978

Director, Nuclear Reactor Regulation
Att: Mr Dennis L Ziemann, 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 ILRT

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

The purpose of the change is to incorporate portions of 10 CFR 50, Appendix J, into the Big Rock Point Technical Specifications and to reiterate the technical justification for not performing an integrated leak rate test during the 1978 refueling outage. In discussions with your staff, it has become apparent that completed staff review of Consumers Power Company's past submittals concerning Appendix J Technical Specifications and exemptions will not be complete prior to the scheduled 1978 refueling outage. Thus, approval of the proposed change is necessary prior to September 1, 1978 in order to ensure that appropriate planning is complete for the scheduled outage.

The proposed changes are taken directly from 10 CFR 50, Appendix J, and are updates of previous submittals. As such, it is concluded that they are purely administrative in content and should be categorized as Class II. A check for the appropriate amount is attached.

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

A. Delete Section 3.7.(f) and replace with the following:

- (f) If two consecutive integrated leak rate tests fail to meet the specifications contained in this section, then an ILRT shall be performed at each plant shutdown for refueling or approximately 18 months, whichever occurs first, until two consecutive ILRTs meet the acceptance criteria. After the above special retest requirement is satisfied, then the testing schedule outlined in 3.7.E may be resumed from the date of the last special test (ie, about 3-1/2 years after completion of the second consecutive satisfactory special test).

B. Delete Section 3.7.(g) and replace with the following:

- (g) All leakage rates determined by a test pressure less than the applicable design pressure (containment design or design basis accident) shall be corrected using the following formula:

$$L_t = L_e (P_t/P_e)^{1/2}$$

L_t = % measured leakage rate, at test pressure.

L_e = % leakage rate, at extrapolated pressure.

P_t = Test pressure (PSIG).

P_e = Extrapolated pressure (PSIG).

Acceptance criteria on allowable leakage is $.75 L_t$.

NOTE: Corrected Technical Specifications pages are attached.

~~50-155~~

II. Discussion

Change A is proposed to update the Big Rock Point Technical Specifications to meet the criteria established in 10 CFR Part 50, Appendix J, Section III.A.6.(b), in terms of required integrated leak rate retest requirements. This change is in full conformance with the cited section of 10 CFR 50, Appendix J; therefore, needs no further technical justification. When approved, this change will allow the scheduling of the next Big Rock Point Plant integrated leak rate test for the 1980-81 refueling outage; justification for which was presented in Special Report 27, dated February 3, 1978, and is attached for convenience.

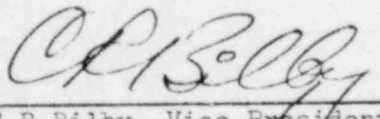
Change B is proposed to incorporate the formula for maximum allowable leakage rate (L_t), as it exists in 10 CFR 50, Appendix J, Section III.A.4.(a).(1).(iii), into the Big Rock Point Technical Specifications since the current Technical Specifications formula is needlessly conservative. The factor of .75 represents the acceptance criteria as specified in Section III.A.4.(a).(2) of Appendix J. Again, since the proposed formula is consistent with Federal regulations, no further technical justification is necessary.

III. Conclusion

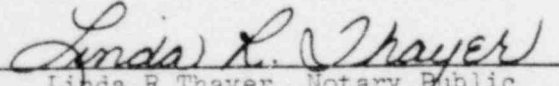
Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have concluded that this change is acceptable.

CONSUMERS POWER COMPANY

By


C R Bilby, Vice President
Production & Transmission

Sworn and subscribed to before me this 17th day of May 1978.


Linda R Thayer, Notary Public
Jackson County, Michigan
My commission expires July 9, 1979.

3.7 (Contd)

leakage rate shall yield an overall leakage rate not greater than 0.5%/day at 27 psig.

- (c) A containment sphere integrated leakage rate test of at least 24 hours duration shall be performed at a pressure not less than 10 psig. Although routine maintenance may be performed, repairs to items listed in 3.7 (a), (b) and (c) shall not be made immediately prior to or during the test.

The accuracy of the leakage rate measuring system shall be verified (1) by superimposing a controlled leakage rate equivalent to the allowable leakage rate at the test pressure (measured through a gas flowmeter) upon the existing leakage rate and continuing the test a sufficient period of time to measure the composite leakage, or (2) by other means of equivalent accuracy.

If the leakage is in excess of 0.5%/day of contained atmosphere (weight basis) at the design pressure (27 psig) or extrapolated to the design pressure, repairs shall be made and the leakage rate test repeated until the 0.5%/day of contained atmosphere (weight basis) specification is met.

- (e) An integrated leakage rate test shall be conducted on the containment sphere at approximately three equal intervals during each 10-year service period.
- (f) If two consecutive integrated leak rate tests fail to meet the specifications contained in this section, then an ILRT shall be performed at each plant shutdown for refueling or approximately 18 months, whichever occurs first, until two consecutive ILRTs meet the acceptance criteria. After the above special retest requirement is satisfied, then the testing schedule outlined in 3.7.E may be resumed from the date of the last special test (ie, about 3-1/2 years after completion of the second consecutive satisfactory special test).
- (g) All leakage rates determined by a test pressure less than the applicable design pressure (containment design or design basis accident) shall be corrected using the following formula:

3.7 (Contd)

(g) (Contd)

$$L_t = L_e (P_t/P_e)^{1/2}$$

L_t = % measured leakage rate, at test pressure.

L_e = % leakage rate, at extrapolated pressure.

P_t = Test pressure (PSIG).

P_e = Extrapolated pressure (PSIG).

Acceptance criteria on allowable leakage is $.75 L_t$.

