



Consumers
Power
Company

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October 28, 1977

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



DOCKET 50-155, LICENSE DFR-6 -
BIG ROCK POINT PLANT -
REVISED FIRE PROTECTION T/S

Transmitted herewith are three (3) original and thirty-seven (37) conformed copies of a proposed change to the Technical Specifications of License DFR-6, Docket 50-155 issued to Consumers Power Company on May 1, 1964 for the Big Rock Point Plant. This proposal supersedes our Technical Specifications change request dated March 29, 1977 concerning fire protection requirements and is based on the revised sample Technical Specifications forwarded to Consumers Power Company by letter dated June 24, 1977.

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 DFR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in Facility Operating License DFR-6, Docket 50-155, be changed as described in Section I below:

I. Changes

- A. Replace Figure 6.2-1 with new Figure 6.2-1.
- B. Section 6.2.2.
 - 1. Add Section 6.2.2.f.
- C. Section 6.4.
 - 1. In Section 6.4.1 replace "Nuclear Training Administrator" with "Plant Superintendent."
 - 2. Add Section 6.4.2.
- D. Add Sections 6.5.2.9.e, f, g.
 - "e. The Facility Fire Protection Program and implementing procedures at least once per 2 years.
 - f. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.
 - g. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years."
- E. Add new Pages 150 through 158.

II. Discussion

The proposed Fire System Technical Specifications for Big Rock Point are based on the sample Technical Specifications dated June 24, 1977. Modifications have been made to suitably adapt the revised sample Technical Specifications dated June 24, 1977 for use. These modifications generally consist of rewording and revamping sample recommendations to be consistent with those already in effect in the Big Rock Point Technical Specifications or procedures, and deleting those that are not applicable or appropriate.

The following is a section-by-section discussion of the proposed Technical Specifications.

1. Administrative Controls

Changes as presented in the revised sample Technical Specifications are incorporated as applicable to the Big Rock Point Plant.

2. Instrumentation - Fire Protection

Table 3.3.8 lists all fire detection equipment currently installed for safety-related systems at Big Rock Point. The minimum number of operable instruments was derived by considering the area of detection influence of each detector and correlating that to the number necessary to ensure full detection in each specific area, based on the hazards involved. Concerning the action items, the requirement to submit a special report to the Commission within 10 days concerning the circumstances of, and restoration procedures for, the inoperable detectors is inconsistent with other reportable items. The conditions prescribed by this sample recommendation meet the criteria established for the 30-day written reports in Section 6.9.2.b of the current Technical Specifications, and are considered adequate. This applies throughout this submittal. Currently, there are no NFPA Code 72D Class A supervised circuits installed at Big Rock Point. Therefore, the surveillance requirements concerning these are not appropriate and the six-month channel functional test is considered adequate.

3. Fire Suppression - Water System

At Big Rock Point the Emergency Core Cooling System (ECCS) utilizes the electric and diesel-driven fire pumps and associated piping. Thus, it was necessary to revamp the sample Technical Specifications to be consistent with the ECCS Technical Specifications requirements of Section 11.3.1.4. Wherever action items concerning fire suppression systems, as recommended in the sample, are already incorporated or exceeded in existing ECCS Technical Specifications, the required ECCS action was considered appropriate and, therefore, not included in this section.

Concerning surveillance requirements pertinent to this section, several changes from the sample Technical Specifications are necessary. There are no storage tanks for fire water at Big Rock Point. Therefore, the

water level in the Intake Bay which is fed by Lake Michigan will be monitored. The 570' elevation was derived by determining the minimum suction level required for the fire pumps. The monthly requirement for running the fire pumps was altered in the proposed Technical Specifications to 5-minute run time for the electric pump and 30-minute run time for the diesel pump. This allows for sufficient run time to bring both pumps to operating temperature and thereby ensure proper operation. Since the term "Staggered Test Basis" is not defined in the Big Rock Point Technical Specifications, it has been deleted from the proposal. However, these changes adequately meet the intent of the sample recommendations. Since all fire system valves at Big Rock Point are hand operated, the requirement for operating testable valves was deleted. Past experience has shown that there have been no fire water flow degradation problems at Big Rock Point and water conditions do not dictate a need to perform system flushes in a 6-month interval and, therefore, this requirement is shifted to a refueling outage periodicity.

4. Fire Spray and/or Sprinkler Systems

As stipulated in Section 2, the sample requirement for a 10-day written report to the Commission was considered inappropriate and would be better served as a 30-day written report in accordance with Section 6.9.2.b of the current Technical Specifications.

Concerning surveillance items, the sample recommendation for cycling each testable valve was again deleted from the proposal since Big Rock Point presently has none that meet this criteria. The sample recommendation for a yearly functional test for the spray and/or sprinkler system was deleted. There exists no means of performing a functional test or simulating automatic actuation of these systems. The yearly requirements to inspect the spray headers for integrity and each nozzle for external blockage are proposed in accordance with the sample recommendation.

5. CO₂ System

The sample Technical Specifications for CO₂ systems have been deleted from the proposal since no CO₂ systems are used at Big Rock Point for the systems discussed.

6. Halon Systems

The sample Technical Specifications for Halon systems have been deleted from the proposal since no Halon systems are used at Big Rock Point for the systems discussed.

7. Fire Hose Stations

The proposed Technical Specifications concerning fire hose stations are consistent with the sample Technical Specifications with two exceptions. The action item requiring routing of an additional hose from an operational station to the unprotected area has been modified to require providing an additional hose at an operation station. This will ensure that the area with an inoperable hose station will be adequately covered by the additional hose available at the operational station, yet the passageway will not be obstructed by fire hose. Additionally, it will ensure that the integrity of the additional fire hose is maintained since it will remain coiled and not subject to inadvertent damage. And, since there are no standpipes in use at operating hose stations, or elsewhere, any mention of standpipes or its associated pressure has been deleted from the proposed Technical Specifications.

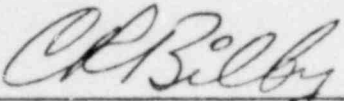
8. Fire Barrier Penetration Fire Seals

Since no fire barrier penetration seals at Big Rock Point act as pressure boundaries, the requirement for leak testing after repair is unnecessary. This sample recommendation has been deleted from the proposal.

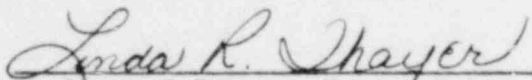
III. Conclusion

Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have concluded that this change does not involve an unreviewed safety question.

CONSUMERS POWER COMPANY

By 
C R Bilby, Vice President
Production & Transmission

Sworn and subscribed to before me this 28th day of October 1977.


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