



Consumers  
Power  
Company

REGULATORY DOCKET FILE COPY

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September 1, 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

Pursuant to your letter of May 26, 1978 concerning the design of a Recirculation Pump Trip System (RPTS) for the Big Rock Point Plant, Consumers Power Company has prepared an RPTS design package (attached). The RPTS design proposed does not meet the design criteria stated in Enclosure I to your letter. It is Consumers Power Company's opinion that the proposed RPTS is an acceptable alternative to a system which would meet all of the stated criteria. A partial basis for this determination is our estimate of the significant added expense that would be associated with an RPTS meeting all proposed criteria. The cost of the proposed RPTS is estimated at \$65,000, whereas the cost of a system meeting the staff's criteria is estimated at over \$400,000.

The plan for the proposed RPTS is submitted in order to comply with your letter of May 26, 1978. It is our position, however, that this RPTS should not be installed at Big Rock Point at this time. This position is based on the following considerations:

1. Consumers Power Company believes ATWS is not a credible event; and, hence, the Big Rock Point Plant design should not reflect any consideration of ATWS.
2. Although it is recognized that an RPTS would partially mitigate the consequences of a hypothetical ATWS, there exists considerable uncertainty concerning the suitability of an RPTS as a total solution to the event for Big Rock Point. The existing ATWS analysis for Big Rock Point (NEDO-2165) indicates that even if an RPTS is installed, credit may still be needed for operator action in less than 10 minutes to mitigate event consequences. This seems to be in conflict with the statement in your letter that you do not give credit for operator action in less than 10 minutes following a transient or emergency condition.

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Further, the existing analysis does not consider the fact that Big Rock Point has no High-Pressure Coolant Injection system and may, therefore, be susceptible to water inventory problems during the postulated ATWS.

3. Big Rock Point is included in the Systematic Evaluation Program (SEP) and ATWS is included as a SEP topic. Thus, there exists a significant probability that any RPTS design could require considerable alteration following completion of the SEP. Hence, implementation of an RPTS should wait until the SEP has been completed.
4. The status of ATWS requirements is uncertain at this time. On April 19, 1978, the NRC Division of System Safety issued the ATWS Staff Report, NUREG-0460, "Anticipated Transients Without Scram for Light Water Reactors." This report is currently under review by ACRS, the Commission itself, and has not been subject to industry comment. Roger Mattson, in his May 17, 1978 ATWS briefing to the Commissioners, stated:

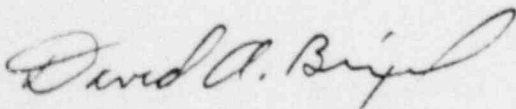
"The new report is intended to form the technical basis for a final policy decision on ATWS. We don't consider it yet to be the final technical word; for example, changes are occurring today and will occur over the next several weeks in response to the processes which are in motion to review the report, namely the ACRS review and the Regulatory Requirements Review Committee review."

The staff report stated that rulemaking is anticipated to ultimately resolve ATWS. Also, decisions on backfit were to be made after the conclusion of the rulemaking. As Roger Mattson stated to the ACRS subcommittee on April 29, 1978:

"On the question of backfit, the Division of Operating Reactors, Victor Stello's division, and the Division of System Safety, my division, will be recommending to the Regulatory Requirements Review Committee that the safety objective and licensing criteria for ATWS first be established for new plants and then operating plants be evaluated case by case over a period of one year to determine the need and desirability of backfit...."

Since no decision has been reached on the validity or applicability of NUREG-0460, it is inappropriate for Big Rock Point to be backfitted in accordance with the criteria given in this report.

As Big Rock Point is being reviewed as part of the SEP, we have concluded that the installation of an RPTS, if required, should be integrated with other items developed from SEP.



David A Bixel  
Nuclear Licensing Administrator

CC: JGKepler, USNRC

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SUBJECT:  
FURNISHING INFO CONCERNING MODIFICATION TO SUBJECT FACILITY'S RECIRCULATION  
PUMP TRIP SYSTEM USING EXISTING INSTRUMENTATION, W/ATT SUPPORTING INFO AND  
DRAWINGS.

SEE REPORTS.

PLANT NAME: BIG ROCK PT

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