



Consumers
Power
Company

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March 17, 1978

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Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
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DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - RESPONSE
TO IE REPORT 50-155/78-01

By letter dated February 16, 1978, Consumers Power Company was requested to respond to one infraction discussed in IE Inspection Report 50-155/78-01. The purpose of this letter is to provide the required response.

Infraction

Technical Specification 6.4.1.d requires that the radwaste effluent monitor alarm be set to warn of concentrations which exceed those listed in Column II, Table II, Appendix B of 10 CFR 20.

Contrary to this requirement, alarm settings for 17 releases made during 1977 exceeded the required levels.

Response

In accordance with Technical Specification 6.4.1.d a process liquid monitor system is provided to (a) give indication of radioactivity trends in process liquid streams which normally contain radioactive liquids, and (b) to warn the operator of radioactivity in process liquid streams that do not normally contain radioactive liquids.

This section specifies the alarm point for any monitors intended to warn the operator of radioactivity in those process liquid streams that do not normally contain radioactive liquids. It identifies these monitors as the Radioactive Waste System Effluent to Canal, the Circulating Water Discharge and the Service Water Return From Reactor Enclosure. The alarm set points for these monitors are to be set to warn the operator when concentrations are present which exceed those listed in Column II, Table II, Appendix B of 10 CFR 20. However, one of

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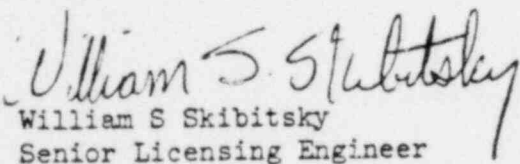
these three monitors, the Radioactive Waste System Effluent to Canal, is recognized to serve another purpose: It is used in conjunction with the liquid waste disposal system. Technical Specification 6.4.1.d states: "...This monitor shall provide an additional means of checking the activity of wastes being discharged...." During the course of a planned release (the activity of which is analyzed in accordance with Technical Specification 6.5.2), the radioactive waste system effluent to canal monitor is considered to be in a liquid stream normally containing radioactive liquid. As such, the alarm set point should be set in accordance with the results of the liquid waste analysis in order to provide an additional means of checking the activity of the wastes being discharged.

In summary, historical interpretation of 6.4.1.d is that the radwaste monitor has two functions:

1. To monitor during periods of no release, at which times the alarm should be set at the limits from Column II, Table II, Appendix B of 10 CFR 20, and
2. To monitor during release of batches of radioactive liquid, at which times the alarm set point should be set to correspond to the activity of the liquid waste as determined by radioisotopic analysis. This set point would include a factor of 2 to facilitate detection of activity greater than that shown by the analysis, yet sufficiently high to preclude spurious alarming.

Conflict with the above interpretation has not occurred previously; however, it is apparent that Technical Specification 6.4.1.d could be edited to more clearly state this interpretation. To accomplish this, a proposed Technical Specifications change will be submitted in May 1978.

Further, the alarm set point for the radwaste monitor during release of radioactive liquid batches will, henceforth, be based upon the activity of the liquid being discharged utilizing a conservative factor of 2 to prevent spurious alarms. Evaluation of the monitor operation and alarm setting during periods of no release will be forwarded in April 1978.


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CC: Director, Office of Nuclear Reactor Regulation
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