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AUG 8 1974

Honorable William G. Milliken
Governor of Michigan
Lansing, Michigan 48933

Dear Governor Milliken:

I understand from recent newspaper reports that Mr. Ralph Nader has written to you concerning the safety of a nuclear plant which the AEC has licensed to operate in the State of Michigan - Consumers Power Company's Big Rock Point Nuclear Plant in Charlevoix County.

Apparently, Mr. Nader has misunderstood or misused information about reactor pressure vessels contained in reports issued by the Advisory Committee on Reactor Safeguards (ACRS) and the AEC Regulatory staff, and in correspondence with Mr. Nader from the Chairman of the ACRS, Dr. William R. Stratton, and the Director of Regulation, Mr. L. M. Muntzing. Copies of these documents and correspondence are enclosed for your reference. The ACRS and the Regulatory staff reports deal primarily with reactor vessels designed and fabricated in accordance with today's nuclear pressure vessel codes. Mr. Muntzing's May 2 letter discussed ten early generation vessels that were designed and constructed to pressure vessel codes in effect during the period of manufacture, and that are still continuing to operate safely in nuclear power plants.

These earlier pressure vessel codes contained rules that reflected the satisfactory experience with vessels in numerous fossil-fueled power plants throughout the United States. In fact, the construction of the earlier vessels was guided also by nuclear standards and codes developed by and used in the Naval reactors program. Older reactor vessels, such as the one at Big Rock Point Nuclear Plant, are not less safe to operate than the vessels built to today's codes. The current nuclear pressure vessel codes merely reflect requirements that include advances in the pressure vessel technology since the period of manufacture of the earlier reactor vessels.

Both the ACRS and the Regulatory staff reports conclude that the probability of a disruptive failure of any reactor pressure vessel is exceedingly small. In fact, recent tests supported by the AEC have

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demonstrated that vessels which were deliberately flawed withstood pressures almost twice as great as they are designed to sustain in operation. Nevertheless, as a matter of conservative Regulatory practice, the staff requires that all reactor pressure vessels, including the one at Big Rock Point Nuclear Plant, be subject to stringent inspection, surveillance and testing programs. The conduct and results of these programs are carefully monitored and evaluated by the Regulatory staff. Despite this, I understand that Mr. Nader has suggested to you that such programs do not exist and that you should take appropriate action.

If it would be helpful, I would be pleased to have appropriate members of the Regulatory staff discuss this matter with you and/or members of your staff. In the meantime, please let me know if I can provide you with additional information about the AEC's Regulatory responsibilities for protecting the public health and safety.

Sincerely,

Original signed by
Dixy Lee Ray
Chairman

Enclosures:

1. Rpt to AEC fm ACRS dtd
January 14, 1974, WASH-1285
2. Itr fm ACRS, Stratton to Nader
dtd March 13, 1974
3. Ltr fm AEC, Muntzing to Nader
dtd May 2, 1974
4. Technical Report by AEC Reg. Staff
dtd May 1974, WASH-1318

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then secondarily encapsulated in a zirconium alloy tube. Each doubly encapsulated source will be equipped with a spring-loaded, bayonet latch locking device to permit it to be locked into a corner fuel rod position in a fuel bundle."

Sincerely,

Peter A. Morris, Director
Division of Reactor Licensing

cc: George F. Trowbridge, Esquire
Shaw, Pittman, Potts, Trowbridge & Madden
910 - 17th Street, N.W.
Washington, D.C. 200061

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cket No. 50-155

Consumers Power Company
ATTN: Mr. Gerald J. Walke
Nuclear Fuel Management
Administrator
212 West Michigan Avenue
Jackson, Michigan 49201

Change No. 23
License No. DPR-6

Gentlemen:

Your Proposed Change No. 25 dated January 18, 1971, and TWX supplements thereto dated February 1 and 9 requested changes to the Technical Specifications of Facility License No. DPR-6 to permit operation of the Big Rock Point Nuclear Reactor with two auxiliary antimony-beryllium neutron sources inserted in the reactor core. The auxiliary neutron sources would be contained in removable fuel rod positions in two fuel bundles to increase the startup count rate. We have ~~redesignated your request~~ Proposed Change No. 23.

We agree that the design of the auxiliary neutron sources is conservative and that safety may be enhanced by the insertion of and operation with the proposed two sources because of the greater ability to measure neutron count rates. We have concluded that the proposed change does not increase the probability of or change the consequences of the design basis accident nor does it involve significant hazards considerations not described or implicit in the Safety Analysis Report. There is reasonable assurance that the health and safety of the public will not be endangered by operation of the Big Rock Point Nuclear Reactor with two auxiliary antimony-beryllium neutron sources in the reactor core in the manner proposed.

Accordingly, pursuant to Section 50.59 of 10 CFR Part 50, Section 5.1.6 of the Technical Specifications of Facility License No. DPR-6 is hereby changed to read as follows:

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"Section 5.1.6 Sources

Type	Antimony Beryllium
Quantity	2 Initial Sources and up to 2 Auxiliary Sources

Location*

The initial neutron sources shall be placed in Core Positions 02-59 and 09-52 as shown in Figure 5.1.

The two auxiliary neutron sources may each be contained in a removable rod in a fuel bundle located one fuel bundle position from the outside of the core, symmetrically near the E-W line through the center of the reactor core.

Physical Description

The initial neutron sources shall consist of a steel jacketed antimony pin, 1 inch diameter by 12 inches long, centrally located on the vertical axis of a steel jacketed (Type 304 SS) beryllium cylinder 5-1/2 OD by 16 inches long. The entire assembly, including support structure, is a cylinder 79-7/16 inches long by 6 inches diameter which rests on a special orifice in a standard support tube and fuel channel. A lifting bail shall be provided for handling purposes. The assembly design shall allow adequate cooling along the surface of the source pin and the outer surface of the assembly.

The auxiliary neutron sources shall each consist of a homogeneous 50-50 mixture of antimony-beryllium first encapsulated in a steel tube (Type 304 SS),

*With in-vessel low-level neutron detectors in service, one operating source may be temporarily relocated as the operator deems appropriate.

bcc: Attached List

Consolidated Edison Company *50-3*
of New York, Inc.
ATTN: Mr. William J. Cahill, Jr.
Vice President
4 Irving Place
New York, New York 10003

Consumers Power Company *50-155*
ATTN: Mr. Ralph B. Sewell
Nuclear Licensing Administrator
212 West Michigan Avenue
Jackson, Michigan 49201

Niagara Mohawk Power Corporation
ATTN: Mr. Philip D. Raymond
Vice President - Engineering
300 Erie Boulevard West
Syracuse, New York 13202 *50-220*

Dairyland Power Cooperative *50-409*
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Jersey Central Power & Light Company
ATTN: Mr. E. R. Finfrock, Jr.
Vice President - Generation
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960

50-219

Connecticut Yankee Atomic Power Company *50-213*
ATTN: Mr. D. C. Switzer
President
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Hartford, Connecticut 06101

Yankee Atomic Electric Company
ATTN: G. Carl Andognini, Assistant to the
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20 Turnpike Road
Westboro, Massachusetts 01581

50-29

Southern California Edison Co.
ATTN: Mr. Jack B. Moore
Vice President
2244 Walnut Grove Avenue
P. O. Box 800
Rosemead, California 91770

50-206

Commonwealth Edison Company
ATTN: Mr. J. S. Abel
Nuclear Licensing Administrator
Boiling Water Reactors
P. O. Box 267
Chicago, Illinois 60690

50-10

Pacific Gas & Electric Company
ATTN: Mr. Fredrick T. Searls
Vice President and
General Counsel
77 Beale Street
San Francisco, California 94106

50-133