

# UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

APR 1 1981

Docket No. 50-155

LICENSEE: Consumers Power Company

FACILITY: Big Rock Point Plant

SUBJECT: SUMMARY OF MEETINGS WITH CONSUMERS POWER COMPANY HELD

ON MARCH 17 AND 18, 1981 TO DISCUSS THE BIG ROCK POINT

PROBABILISTIC RISK ASSESSMENT

On March 17 and 19, 1981, the NRC staff met in Bethesda, Maryland with representatives of Consumers Power Company and their consultants. The purpose of the meetings was to discuss the results of the licensee's Probabilistic Risk Assessment (PRA) of the Big Rock Point Plant. A list of attendees is enclosed (Enclosure 1).

The licensee explained that the motivation for the PRA study was their concern regarding projected capital expenditures at the Big Rock Point Plant. These expenditures are exceeding six million dollars per year whereas the licensee's analysis shows that the economic break even point, depending on number of years of plant operation, is between one and four million dollars per year. Consumers Power Company feels that they cannot spend significant sums of money on solutions that provide little or no increase in safety for the Big Rock Point Plant.

The PRA study objectives were:

- Perform a comprehensive and systematic evaluation of plant safety.
- 2. Maintain technical objectivity in this effort.
- 3. Explore means of reducing plant risk.
- 4. Evaluate effectiveness of regulatory issues using PRA.
- Develop a cost effective risk management program for Big Rock Point.

The licensee has stated that the PRA indicates that there are some highly cost-effective actions that can be taken to reduce risk. These modifications, if implemented, would reduce the frequency of core damage events (currently about  $9.8 \times 10^{-4}$  per year) by a factor of 15 to 20.

The licensee will submit the PRA on March 31, 1981. PRA-based documentation for deferral of certain regulatory requirements, including certain NUREG-0737 items, will also be submitted on March 31, 1981. The licensee wants a "provisional acceptance" from the NRC which involves our agreement to defer those items requested by the licensee pending the completion of our detailed review of the PRA. A "provisional acceptance", if agreed to by the NRC, would imply approval of PRA-based licensing decisions for the Big Rock Point Plant. Some of the NUREG-0737 items that Consumers Power Company identified as being directly affected by PRA are:

- II.B.2 Design Review of Plant Shielding and Environmental Qualification of Electrical Equipment for Spaces/
  Systems which may be used in Post-Accident Operations
- II.B.3 Post-Accident Sampling Capability
- Instrumentation for Detection of Inadequate Core Cooling
- II.K.3.14 Isolation of Condensers on High Radiation
- II.K.3.19 Interlock on Recirculation Pumps Loops
- III.A.1.2 Upgrade Emergency Support Facilities (NUREG-0696)
- III.D.3.4 Control Room Habitability

Other issues identified by the licensee as being affected by PRA include electrical equipment qualification, fire protection, systematic evaluation program, generic issues, and IE Bulletins.

If the NRC provides "provisional acceptance" of the licensee's position, Consumers Power Company will initiate detailed design activities on PRA-recommended modifications. Implementation of the PRA-recommended modifications would be accomplished following NRC's completion of the review of the PRA.

The licensee discussed the PRA methodology, risk outliers, and the proposed short term plan (application to NUREG-0737 and other items). If the Big Rock Point PRA is accepted by the NRC, the licensee plans to maintain the PRA through updating as better data become available.

The licensee did not do an independent detailed quantification of the probability of failure to scram; rather, a value of 3  $\times$  10<sup>-5</sup> was used based on NUREG-0460. The NRC staff stated that the licensee should review

this value of failure to scram especially considering the Commission paper (SECY 80-409, September 4, 1980) on BWR scram system experience.

The viewgraphs used during the presentations are enclosed (Enclosure 2).

Walter A. Paulson, Project Manager Operating Reactors Branch #5

Division of Licensing

# MEETING SUMMARY DISTRIBUTION

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#### ATTENDANCE LIST

## MEETING MARCH 17, 1981

# NRC AND CONSUMERS POWER COMPANY

# (BIG ROCK POINT)

#### NAME

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#### ATTENDANCE LIST

### MEETING ON MARCH 18, 1981

#### NRC AND CONSUMERS POWER COMPANY

## (BIG ROCK POINT)

#### NAME

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ENCLOSURE 2