



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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Nuclear Regulatory Commission
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Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
TECHNICAL SPECIFICATION CHANGE REQUEST - REACTOR
TEMPERATURE LIMITS

Attached is a request for change to the Big Rock Point Plant Technical Specifications. This change is requested to insure that the specifications for the Reactor Vessel continue to satisfy the Fracture Toughness requirements of Section V of 10 CFR Part 50, Appendix G. In compliance with the Scheduler requirements of Generic Letter 88-11 dated July 12, 1988, and with consideration of the existing fluence effect on the Big Rock Point Reactor Vessel, Consumers Power Company is requesting a change to the Big Rock Point Technical Specification pressure-temperature limits, derived using the methodology contained in Revision 2 to Regulatory Guide 1.99. Attachment 1 to this letter contains the proposed Technical Specification page changes, Attachment 2 contains the associated Technical Analysis.

Kenneth W Berry
Director, Nuclear Licensing

CC Administrator, Region III, USNRC
NRC Resident Inspector - Big Rock Point

Attachment

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CONSUMERS POWER COMPANY
Docket 50-155
Request for Change to the Technical Specifications
License DPR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in the Facility Operations License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964, for the Big Rock Point be changed as described in Section I below:

I. Changes

A. Change Section 4.1.1(1)4 to read as follows:

4. The reactor shall not be made critical, with the exception of physics testing, at temperatures below the criticality limit shown on Figures 4.1(b) and 4.1(c).

B. Replace Figure 4-1(a) Hydrostatic Test Pressure/Temperature Limits, Figure 4-1(c) Heatup Pressure/Temperature Limits, and Figure 4-1(b) Cooldown Pressure/Temperature Limits with the attached revised curves.

II. Discussion

The above proposed Technical Specification Change A is administrative in nature and is proposed to correct an editorial error. The proposed change uniquely identifies the two controlling Figures used to establish the lower limits of criticality.

The enclosed Attachment 2 provides the basis for Technical Specification Change B. The limits specified by this change are being submitted to satisfy the requirements of 10 CFR 50 Appendix G by incorporating the methodology of Regulatory Guide 1.99 Revision 2.

III. Analysis of No Significant Hazards Consideration

Proposed Change A is administrative in nature and provides clarification of existing requirements. It is not associated with any modification to plant equipment, systems, or components and does not change any existing administrative controls or operability limitations on existing equipment. The proposed change corrects an editorial deficiency inadvertently missed in a previous Technical Specification Change Request. The proposed change, therefore, does not affect the probability or consequences of an accident previously evaluated. Because the proposed change does not involve any plant modifications, operability limits, or procedural controls, it does not create the possibility of a new or different kind of accident than previously evaluated nor involve a reduction in margin of safety. Consequently, the proposed change A does not involve a significant hazards consideration.

The Big Rock Point Plant Review Committee has concluded that the proposed Pressure/Temperature Limits, proposed by Change B, do not involve an unreviewed safety question. The margin above Nil Ductility Transition Temperature (NDTT) is governed by 10CFR50 Appendix G and remains unchanged. The predicted shifts in NDTT are based on a revised reference temperature consistent with Regulatory Guide 1.99 Rev 2. The method of revising the new Pressure/Temperature Limits is the same as in the past (ASME Code Section III, Appendix G). The proposed curves were generated for an 18 Effective Full Power Year exposure and are conservative until that time. Based on the above, the margin of safety has not changed.

Therefore, the operation of the facility in accordance with the above proposed Change B would not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in the margin of safety.

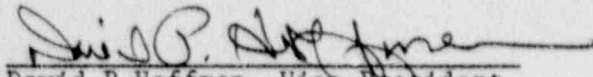
IV. Conclusion

The Big Rock Point Plant Review Committee has reviewed this Technical Specification Change Request and has determined this change does not involve an unreviewed safety question and, therefore, involves no significant hazards consideration. This change has been reviewed by the Nuclear Safety Services Department. A copy of this Technical Specification Change Request has been sent to the State of Michigan official designated to receive such Amendments to the Operating License.

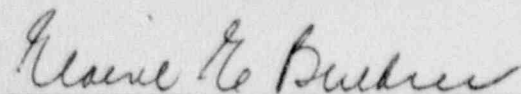
CONSUMERS POWER COMPANY

To the best of my knowledge, information and belief, the contents of this submittal are truthful and complete.

By


David P Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 10th day of January 1990.


Elaine E Buehrer, Notary Public

Jackson County, Michigan

My commission expires October 11, 1993