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

January 27, 1981

Docket No. 50-155
LS05-81-01-039



Mr. David P. Hoffman
Nuclear Licensing Administrator
Consumers Power Company
1945 W. Parnall Road
Jackson, Michigan 49201

Dear Mr. Hoffman:

We are continuing our review of the Inservice Testing Program (IST) for the Big Rock Point Plant. Consumers Power Company (CPC) is required by 10 CFR 50.55a(g) to have an IST program meeting the 1974 Edition of the ASME code with the 1975 Summer Addenda. The code states that safety-related, locked-open or locked-closed valves shall be categorized as E and must meet the "testing" requirements for Category E valves.

Nearly all operating plants have locked-valve lists which meet the "testing" requirements of the ASME code. These plants have categorized the safety-related, locked valves as Category E and have included these valves in their IST Program. We understand from our discussions with your staff that listing the Category E valves in the IST Program is an additional administrative chore without any safety benefit. We do not agree.

We have determined that Category E valves must be included in the Big Rock Point IST Program on the following bases:

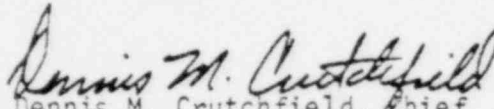
1. CPC would be in non-compliance with 10 CFR 50.55a(g) since we have not granted and do not intend to grant relief from this ASME code requirement at this time. Further, CPC has not requested specific relief.
2. We would be inconsistent in the regulatory approach being taken with other licensees.
3. Inspection and Enforcement (IE), in developing the IST inspection requirements, would be misled in assuming that Category E valves are not part of our program requirements.
4. The 1977 Edition of the ASME Code has eliminated Category E valves from the code. However, our staff is still reviewing this item and have not agreed to elimination at this time.

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On this basis, we request that you provide a revision to your proposed IST Program within 45 days from receipt of this letter.

Sincerely,


Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

cc: See next page

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