Consumers Power Company

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October 12, 1982

Dennis M Crutchfield, Chief
Operating Reactors Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - REQUEST FOR
EXEMPTION FROM 10 CFR 50 APPENDIX J,
SENSING LINES FOR CONTAINMENT PRESSURE

Consumers Power Company letter dated February 13, 1976 reported the results of a review of all piping penetrations required under the Type C testing requirements of 10 CFR 50 Appendix J and requested specific exemptions. The letter identified five sensing lines for containment pressure instrumentation and concluded Type C penetration testing was not necessary. By telephone conversation of August 3, 1982, you informed us that our February 13, 1976 letter was not considered an exemption request for the five containment pressure sensing lines. Our letter of August 19, 1982 therefore specifically requested relief from the 10 CFR 50, Appendix J Type C testing requirements for the containment pressure instrument lines.

On September 28, 1982, the concurrence that Type C testing is not applicable for the five instrument lines was provided via telephone conversation. However, we were also informed that an exemption for Type B testing is required. Therefore, it is the intent of this letter to specifically request relief from the 10 CFR 50, Appendix J Type B testing requirements for the containment pressure instrument lines at the following penetrations:

H-89, H-90, H-96, H-98, H-99

This relief request is supported by Franklin Research Center via their Technical Evaluation Report (TER) dated April 30, 1982 and titled Containment Leakage Rate Testing - (A-04). The report recommends that exemptions for the instrument pressure lines be granted. It notes that the lines are tested as

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part of the integrated (Type A) leakage rate tests since each of the lines is exposed to the containment atmosphere. In addition, it should be noted that no significant degradation of the penetration seals has been observed.

Thomas C Bordine
Staff Licensing Engineer

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

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