



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

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Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

**DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
TECHNICAL SPECIFICATION CHANGE REQUEST - ADDITION OF ECCS ACCEPTANCE CRITERIA
FOR THE ELECTRIC AND DIESEL FIRE PUMPS - REVISION 1**

Attain is Revision 1 to a request for change to the BRP Technical Specifications previously submitted on June 11, 1993. After review, the Office of Nuclear Reactor Regulation (NRR) Project Manager noted that a problem existed with the text. This submittal corrects and clarifies the problem text and is denoted by slashes in the margin.

The proposed changes are in follow-up to a Notice of Violation and Unresolved Item contained in Inspection Report 50-155/92006. The concern was that the inservice pump test failed to incorporate the acceptance limits contained in the Emergency Core Cooling System (ECCS) document. As discussed in a letter dated June 15, 1992, CPGCo agreed to evaluate incorporating the ECCS acceptance criteria into the BRP Technical Specifications.

The BRP Technical Specifications since original issuance, did not require performance testing and associated acceptance criteria for the ECCS (Diesel and Electric Fire Pumps). On October 28, 1977, Consumers Power Company submitted proposed Technical Specifications concerning fire protection requirements following the guidance of the NRC letter dated June 24, 1977. It was in these proposed changes that the current acceptance criteria (1,000 gpm @ 110 psi) and testing frequency (each major refueling) for each fire pump was requested for inclusion in the Technical Specifications. The acceptance criteria of 1,000 gpm @ 110 psi was chosen based upon the manufacturer's rating of the pumps and was not tied to any minimum system flow requirement for either Fire Protection or ECCS functions. These proposed changes were approved and Amendment 17 as issued on March 6, 1978.

Since the Fire Protection System provides a dual role at BRP (Fire Protection and ECCS), this acceptance criteria has governed Operability of the pumps for both Fire Protection and ECCS even though the criteria was not based upon ECCS requirements. Even following the extensive 10 CFR 50 Appendix K analyses and testing as described in Consumers Power letter of April 15, 1993, the

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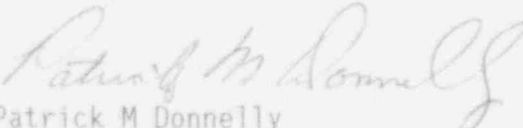
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acceptance criteria was neither added or modified in the Technical Specifications.

In conclusion, these proposed Technical Specifications provide two benefits:

- 1) Will add acceptance criteria for the electric and diesel fire pumps based upon the ECCS performance requirements of the primary and backup core spray and containment spray systems. This will resolve the NRC Inspector's concern expressed in Inspection Report 50-155/92006.
- 2) Will remove a portion of the Fire Protection Requirements from the Specifications in response to the Commission's Interim Policy Statement on Technical Specification Improvement.


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

ATTACHMENT