



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 -
RESPONSE TO INSPECTION REPORT 50-155/90013 (DPR)

Inspection Report No. 50-155/90013, received on September 24, 1990 expressed two concerns which deserve further explanation.

The first, described on Page 8 of the report, states that Big Rock Point was not performing scram time tests as suggested in a General Electric Operating Experience Report dated July 12, 1972.

Big Rock Point was informed of the concern raised at Nine Mile Point by the Resident Inspector. After promptly contacting General Electric to obtain the date of the report (attached), a review of plant actions in 1972 was conducted. As can be seen, the report recommended that plants utilizing Greer accumulators verify the status of their bladders at the earliest opportunity by performing scram tests at zero pressure with the charging water valve closed.

Big Rock Point performed this requested test in November 1972 which was the first shutdown following receipt of the Operating Experience Report. Results of these tests showed that scram times with the charging water valved in and out, varied by a maximum of .37 seconds and all times well within Technical Specification requirements.

The General Electric Operating Experience Report did not recommend that all testing be performed with the charging water isolated but only recommended a one-time test. The results at Big Rock also concluded that a revised test method was not necessary.

In follow-up discussions with General Electric personnel about Scram testing at Big Rock Point, they felt that although the Big Rock Point CRD's are different than the newer drives, testing with the charging water valved out was a prudent method. General Electric felt that this method would detect drive filter or ball check valve degradation. This discussion with General Electric led us to the conclusion that a test method change was appropriate.

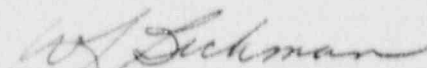
With regard to the delay in issuance of Amendment No. 102 to the Big Rock Point Technical Specifications, it should be noted that the amendment contained administrative and editorial changes exclusively. The majority of the changes
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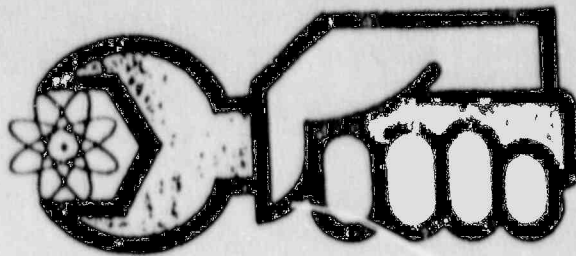
contained in the amendment included corrections to typographical errors, capitalization of terms, and reformatting of text, in the words of Inspection Report 90-013, "these changes had no direct safety impact on plant operations." Because it was administrative in nature, issuance of Amendment No. 102 received a lower priority that would have an amendment of technical significance. The majority of the preparation time involved in issuance of the amendment involved verifying that the more than one hundred (100) separate technical specification changes were correct and matched the changes requested. It should be noted that within Amendment No. 102, the NRC incorporated six (6) separate Consumers Power Company Technical Specification Change Requests dating back as far as February 6, 1987.

Regarding the issuance of the correction to Amendment No. 102, Nuclear Licensing Department (NLD) procedures require that a Document Transmittal Sheet be attached to all new Technical Specification pages when distributed. The Document Transmittal Sheet contains a request for comments and acknowledgment of receipt and is required to be returned to the NLD within 14 working days. Once all comments are received and resolved, necessary corrections are made, and new pages are issued. The correction was issued on September 19, 1990. As noted in the report, it is normally our practice to issue Amendments quickly to insure that Administrative and Working Level Procedures can be changed to reflect the Amendments. However, in this case, procedure changes were not necessary since the Amendment contained editorial changes exclusively and we felt it appropriate to assign issuance a lower priority.


W L Beckman
Plant Manager

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

Attachment



boiling water reactor
**operating
experience
report**

July 12, 1974

Ref. No. 1000

CRD GREER BLADDER-TYPE ACCUMULATORS

During recent control rod drive testing at an operating BWR plant with bladder-type accumulators, approximately 25 CRDs did not fully insert when being individually scrammed with the water charging valve closed. Subsequent investigations revealed that the failure of the CRD to completely insert was due to premature closure of the accumulator poppet valve. The premature closure was caused by stretching of the gas bladder. In some cases the bladder had stretched between two to three inches past its original length.

CRD scram testing at "vessel head off conditions", with the water charging valve closed, is performed to test the capability of the associated accumulator without any assist from the CRD Hydraulic System Pumps. In single scram testing with the water charging valve open, the pump acts as a back-up accumulator and can mask accumulator deficiencies such as premature poppet closure. Individual scram testing at the above-mentioned plant on the same CRDs with the charging valve open indicated normal CRD performance.

The test with the charging valve closed is not a hypothetical test. It simulates system scram performance when a scram occurs at low pressure, such as a scram at initial criticality. When this occurs, the pump does not have the capacity to simultaneously back up all the accumulators, and slow or partial insertions due to premature accumulator can occur. Premature closure at normal reactor pressure most probably would not have been noted since most of the water required for scram under these conditions comes from the reactor rather than the accumulators.

Because of the experience we have gained, we are recommending that other plants utilizing these Greer bladder-type accumulators verify the status of their bladders at the earliest opportunity. The test must be conducted at "zero vessel pressure", with the appropriate accumulator water charging valve closed.

D. G. Bridenbaugh,
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