



Consumers
Power
Company

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Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
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DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - REVISION TO IE BULLETIN
80-24 RESPONSE - PREVENTION OF DAMAGE DUE TO
WATER LEAKAGE INSIDE CONTAINMENT

Following the recent failure of tubes in the containment ventilation system heating and cooling heat exchanger (reported in Licensee Event Report 82-18 dated June 8, 1982) the NRC resident inspector at Big Rock Point noted some information in Consumers Power Company response to IE Bulletin 80-24 dated December 23, 1980 which is incorrect.

Attached to this letter is a revised page two of our December 23, 1980 submittal in which the inspector's concerns were addressed. This revision is not intended to be an update. It contains information to make the response correct as of December 23, 1980. The revised portions are indicated by a vertical line in the right hand margin.

Leakage and repair, Items 1.d and 1.e, in the systems which are subject to the Bulletin and which has occurred since December 1980 are described in LER 81-24.

David J VandeWalle
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CC Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement
NRC Resident Inspector-Big Rock Point

Attachment - 1 page

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- g. Provisions for testing isolation valves in accordance with Appendix J to 10 CFR 50.
- h. Instrumentation (pressure, dew point, flow, radiation detection, etc) and procedures in place to detect leakage.
- i. Provisions to detect radioactive contamination in service water discharge from containment.

Response

- 1. The only open cooling water system within containment at Big Rock Point considered to fall within the scope of concern of the bulletin is the service water system which supplies raw Lake Michigan water to six devices in the reactor enclosure.
 - a. Two 2100 gal/min centrifugal pumps (one running, one in auto standby) supply two reactor cooling water heat exchangers and two reactor building heating and cooling heat exchangers and two pipeway air coolers. There is also a locked shut cross-connection to the fire system inside containment for emergency supply to the reactor cooling water heat exchangers. All valves in the system are manual; therefore, the system will remain in its normal operating configuration in response to a LOCA.
 - b. Weekly Lake Michigan water chemical analyses for the month of November 1980, considered representative of year-round values, are attached.
 - c. Service water piping material is seamless carbon steel, ASTM A-53, Gr A. Heat exchanger tubing is Admiralty metal for the reactor cooling water heat exchangers and the pipeway air coolers. Carbon steel tubes are currently being used in the reactor building heating and cooling heat exchangers.
 - d&e. Minor through-wall leakage occurred December 4, 1980 in one of the two pipeway air coolers and repair of one tube was made by silver soldering. Leakage has occurred requiring tube plugging on several occasions in both heating and cooling heat exchangers between 1972 and 1975. In 1975 both original 1962 vintage Admiralty tube bundles were replaced with carbon steel tube bundles.
 - f. All coolers within containment supplied by the service water system are provided with manual isolation valves; single failure criteria was not considered in system design.
 - g. Service water isolation valves to the six heat exchanger/coolers are not normally leak tested. These are manual valves and would not be accessible for operation during post-LOCA conditions.
 - h. The Big Rock Point Plant has a dirty sump and a clean sump at the bottom of the containment sphere, elevation 573'. Each of these sumps