



Consumers  
Power  
Company

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

August 19, 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. Therefore, it is the intent of this letter to specifically request relief from the 10 CFR 50, Appendix J Type C 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 since a passive failure must occur for a leakage path to be present. In addition, the TER identified that the lines are tested as part of the integrated (Type A) leakage rate tests since each of the lines is exposed to the containment atmosphere.

It should also be noted that our review of the draft TER and the accompanied staff Safety Evaluation Report (SER) dated May 21, 1982 has identified an apparent omission of a referenced document. Consumers Power Company proposed Technical Specification Change Request dated January 7, 1980 - "Containment Sphere Leakage Testing" contained related 10 CFR 50 Appendix J concerns that were not incorporated within the scope of your review. The change establishes surveillance intervals that are required by 10 CFR 50 Appendix J as well as

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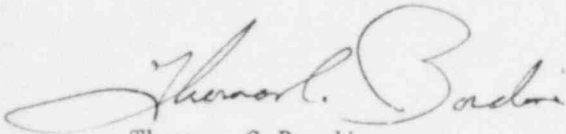
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D M Crutchfield, Chief  
Big Rock Point Plant  
Exemption Request 10 CFR 50, App J  
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Section XI, IWV and IWP of the Boiler and Pressure Vessel Code. The proposed surveillance intervals will provide more flexibility in the utilization of the testing medium (air or the normal working fluid) as well as improve scheduling consistent with our refueling shutdowns. We consider this change as high priority and should be essential to your overall review and development of positions which assure that the objectives of the cited regulation are satisfied.

We therefore request an update to the SER/TER Appendix J review of Big Rock Point Plant which incorporates our exemption request for the containment pressure sensing lines and our technical specifications change request which reflects surveillance intervals consistent with the requirements of Appendix J.



Thomas C Bordine  
Staff Licensing Engineer

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