



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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

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August 15, 1990

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
TECHNICAL SPECIFICATION CHANGE REQUEST - SURVEILLANCE INTERVALS

Attached is a request for change to the Big Rock Point Technical Specifications. This change is requested in response to Generic Letter 89-14, dated August 21, 1989, which concluded that removal of the 3.25 limit on surveillance intervals from the Technical Specifications results in a greater benefit to safety than limiting the use of the 25 percent allowance to extend surveillance intervals. Consumers Power Company has utilized the NRC staff guidance, which accompanied the Generic Letter, during preparation of the proposed Technical Specification change. Attached please find the Request for Change to the Technical Specifications followed by the Proposed Technical Specification Page Changes.

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CONSUMERS POWER COMPANY
Docket 50-155
Request For Change to the Technical Specifications
License DPR-6

For the reasons hereinafter set forth, it is requested that the Technical Specifications contained in the Facility Operating License DPR-6, Docket 50-155, issued to Consumers Power Company on May 1, 1964, for the Big Rock Point Plant be changed as described in Section I below:

I. Changes

A. Change Section 1.1.4 in its entirety to read as follows:

"Surveillance requirements shall be applicable as specified for individual components or systems as stated in individual specification requirements. Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval."

II. Discussion

The NRC issued Generic Letter 89-14 on August 21, 1989, which discussed Technical Specification limitations on surveillance intervals. Based upon the NRC review of a lead-plant proposal, the NRC staff concluded that removal of the 3.25 limit from the Specifications results in a greater benefit to safety than limiting the use of the 25 percent allowance to extend surveillance intervals. Review of Generic Letter 89-14 by Consumers Power Company personnel resulted in concurrence with the NRC evaluation. The proposed Technical Specification change follows the NRC staff guidance for removal of the 3.25 limitation from the Big Rock Point Technical Specifications.

III. Analysis of No Significant Hazards Consideration

As discussed in the NRC staff evaluation in Generic Letter 89-14, experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. The use of the allowance to extend surveillance intervals by 25 percent can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation.

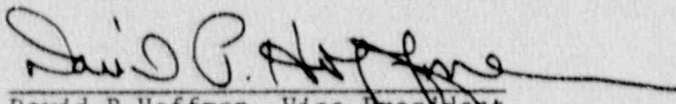
This proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because a safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing maintenance or other surveillance activities. The proposed change does not create the possibility of a new or different kind of accident than previously evaluated because no modifications to plant equipment, changes to setpoints, or operating parameters are being proposed. This proposed change does not involve a significant reduction in a margin of safety as defined in Technical Specification bases because there are no bases for administrative controls in the BRP Technical Specifications. Additionally, the safety benefit of allowing the use of the 25 percent allowance to extend a surveillance interval would outweigh any benefit derived by limiting three consecutive intervals to the 3.25 limit. The limitations of Specification 1.1.4 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval. Therefore, the proposed change does not involve a significant hazards consideration.

IV. Conclusion

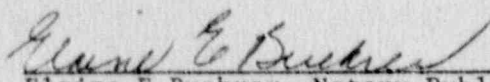
The Big Rock Point Plant Review Committee has reviewed this Technical Specification Change Request and has determined this change does not involve an unreviewed safety question and, therefore, involves no significant hazards consideration. This change has been reviewed by the Nuclear Safety Services Department. A copy of this Technical Specification Change Request has been sent to the State of Michigan official designated to receive such Amendments to the Operating License.

CONSUMERS POWER COMPANY

To the best of my knowledge, information and belief, the contents of this submittal are truthful and complete.

By 
David P Hoffman, Vice President
Nuclear Operations

Sworn and subscribed to before me this 17th day of August 1990.


Elaine E Buehrer, Notary Public
Jackson County, Michigan
My commission expires October 11, 1993