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Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 -  
BIG ROCK POINT PLANT - SEP TOPIC III-3.C,  
"INSERVICE INSPECTION OF WATER CONTROL STRUCTURES" -  
SUMMARY OF FORMALIZED INSPECTION PROGRAM

This letter documents Consumers Power Company response to the NRC Safety Evaluation Report dated October 12, 1982 and provides a status summary of the formalized inspection program as described in our letter dated December 21, 1981, entitled "SFP Topic III-3.C, Inservice Inspection of Water Control Structures for the Big Rock Point Plant".

The Big Rock Point water control structures (ie, offshore intake structure, offshore intake line and the screenhouse which includes the diesel generator and discharge structure) normally provide plant circulating water flow of 50,000 gpm during plant operation. Degradation of water control structures of such severity as to reduce circulating water flow to a level which approaches the minimum safety-related flow requirement would not go undetected. To approach the minimum safety-related requirement would require that the flow be reduced from its normal value of 50,000 gpm to the minimum requirement of 1,000 gpm; a reduction that would be monitored by the operator since condenser vacuum would be significantly affected. Furthermore, if a highly unlikely catastrophic failure of the intake structure was to occur, a large 24 inch warm water recirculation line may be used to supply the necessary water from the discharge structure for plant cooldown requirements and for maintaining the plant in a safe shutdown condition.

Existing plant operations and maintenance activities provide assurance of the continued integrity of the water control structures. The plant operators perform a surveillance approximately every two hours to inspect water level and flow conditions of the screenhouse and associated equipment. As part of the surveillance, the operators inspect the water level at the weir in the outlet to the discharge and inspect the water level in the forebay. In addition, the forebay water level is logged once per shift. The forebay water level inspections are performed to insure that a minimum level of 570 feet exists as required by Technical Specifications. Both of the aforementioned water level inspections provide an adequate indication that the intake and

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discharge areas are clear and functioning properly. In addition, if the water level is low in the forebay, a local alarm will sound to alert the operators to conduct an inspection and take remedial actions.

The most recent inspection of the intake structure was conducted in June, 1982. The results of this inspection, as evaluated by a qualified engineer and the diving firm, indicated that the intake crib was sturdy and in good condition. The results of the inspection also indicate that very little structural degradation has taken place in 20 years of service.

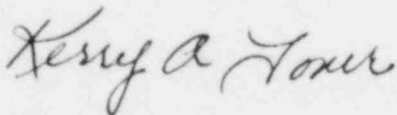
Based upon the above discussion, the proposed program for the Inservice Inspection of Water Control Structures at the Big Rock Point Plant is as follows:

1. The offshore intake structure and those portions of the screenhouse structures (which include the diesel generator room, discharge structure and forebay) that are submerged, will be inspected on five-year intervals in accordance with a formalized inspection program for structural integrity and siltation. The five-year interval will commence after the conclusion of the screenhouse structures inspection scheduled for the next refueling outage. The results of such inspections shall receive an engineering review.

It should be noted that Consumers Power Company does not plan to inspect the offshore intake line or the interior of the offshore intake structure because adequate assurance of the capability to perform essential safety functions is demonstrated continuously by normal circulating water flow. The benefits of such inspections are not considered to outweigh the risks to the inspector (i.e., diver).

2. The plant surveillance activities shall continue as summarized above and described in our December 21, 1981 letter.
3. The inspection and maintenance of the trash racks and traveling screens shall continue as described in our December 21, 1981 letter.

It is Consumers Power Company's position that the above described Inservice Inspection and Surveillance program conforms with the intent of Regulatory Guide 1.127 and that this submittal constitutes completion of SEP Topic III-3.C for the Big Rock Point Plant.



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