



**Consumers
POWER**

**POWERING
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10260 US 31 North, Charlevoix, MI 49720

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November 5, 1990

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT - REQUEST FOR WAIVER OF COMPLIANCE TO SECTION 7.5.7 OF THE TECHNICAL SPECIFICATIONS

This letter transmits our Request for Waiver of Compliance to Section 7.5.7 of the Technical Specification following our discussions with the NRC Resident Inspector of November 3, 1990. Although Consumers Power Company still supports that Big Rock Point was in compliance with the Specifications, the request is being made to document any ambiguity which may exist in interpreting the specification. The request follows the guidelines of the letter from Mr. Murley dated February 22, 1986 discussing Waivers of Compliance.

DISCUSSION OF THE REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED:

Tech Spec 7.5.7

It shall be permissible to remove a control rod drive from the reactor vessel when the reactor is in the SHUTDOWN condition and the mode selector switch is locked in the "Shutdown" position.

The core shutdown margin of $0.3\% \Delta k_{eff}/k_{eff}$ with the strongest control rod out of the core shall have been met prior to the control drive removal; and in addition, the equipment shall be properly tagged. The control rod drive that was removed shall without delay be replaced by a spare control rod drive or the original control rod drive shall be reinstalled. One control rod drive pump shall be operating during removal and reinsertion and during the time the control rod drive is outside the reactor vessel.

This specification requires that the mode switch is locked in the "Shutdown" position and a drive pump on to minimize the probability of inadvertent criticality when drives are removed with fuel in the reactor. With no fuel in the reactor Consumers Power supports that the restrictions of 7.5.7 do not apply since criticality is not an issue.

DISCUSSION OF CIRCUMSTANCES

Currently leaving a CRD pump on during drive removal causes excessive flow to the reactor vessel causing the stand pipe drain capacity to be exceeded. This causes extension tank to overflow into the rod drive room where the drive maintenance is

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performed causing a radiological hazard. Since no fuel is in the reactor removal of the pump from service to eliminate this condition is prudent.

COMPENSATORY ACTIONS

None necessary.

SAFETY STRENGTHENING AND DURATION

This change has no impact on safety since, there is no fuel in the reactor. The change follows the guidance of the Standard Tech Specs (NUREG-0123) and the Region III concurrence dated May 17, 1979 (see attached). The change does not constitute a significant hazards consideration or create irreversible environmental consequences. The duration of this change will be the 1990 Refueling Outage.

The above change has been reviewed and approved by the Big Rock Point Plant Review Committee.



William L. Beckman
Plant Manager

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

Attachment

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