

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

December 11, 1990

Docket No. 50-155

Mr. William L. Beckman, Plant Manager Big Rock Point Nuclear Plant 10269 U.S. 31 North Charlevoix, Michigan 49720

Dear Mr. Beckman:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - NRC GENERIC LETTER 88-01, "NRC POSITION ON IGSC" IN BWR AUSTENITIC STAINLESS STEEL PIPING" (TAC NO. 69127)

During our review of the Consumers Power Company response to NRC Generic Letter (GL) 88-01, the NRC staff has determined that additional information is required to evaluate a number of your positions regarding implementation of an IGSCC monitoring program at Big Rock Point. The positions which require additional discussion are:

- Your future inspection plans; in specific, your plans not to inspect IGSCC Category D welds.
- Your decision not to follow guidance provided in GL 88-01 with regard to inspection methods and personnel.
- Your position not to amend the Technical Specifications (TS) to include a statement concerning inservice inspection as required by GL 88-01.
- Your position regarding the inspection of inaccessible welds.
- Your position concerning the frequency of leakage monitoring (daily vs. every four hours as described in the GL).
- Your decision not to amend the TS to include requirements regarding the operability of monitoring instruments as outlined in the GL.

In addition, the staff recommends that you include the Reactor Water Cleanup (RWCU) system piping your IGSCC inspection plan even though the RWCU piping at Big Rock Point is smaller than the 4 inch minimum diameter criteria defined in the GL. This IGSCC inspection plan should not only include the piping inside the RWCU containment isolation valves, but should include welds outside the isolation valves as well. Welds outside the isolation valves may be inspected on a sampling basis of at least a 10% sample size. If cracks are found in this inspection sample, you should discuss expansion of the inspection simple and your proposed mitigation methods with the staff.

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In order for the staff to complete its review of your response to GL 88-01, we request that, within 60 days, you provide additional information conforming your positions as noted above.

Sincerely.

Robert J. Stransky, Jr. Project Manager Project Directorate 111-1 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation Mr. William L. Beckman Big Rock Point Nuclear Plant

Big Rock Point Plant

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Mr. Thomas A. McNish, Secretary Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49201

Judd L. Bacon, Esquire Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49201

Mr. Thomas C. Bordine Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49201

Jane E. Brannon, County Clerk County Building Charlevoix, Michigan 49720

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Regional Administrator, Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137

Nuclear Facilities and Environmental Monitoring Section Office Division of Radiological Health P. O. Box 30035 Lansing, Michigan 48909

U.S. Nuclear Regulatory Commission Resident Inspector Office Big Rock Point Plant 10253 U.S. 31 North Charlevoix, Michigan 49720 In order for the staff to complete its review of your response to GL 88-01, we request that, within 60 days, you provide additional information concerning your positions as noted above.

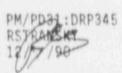
Sincerely,

Robert J. Stransky, Jr. Project Manager Project Directorate III-1 Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

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