



Consumers
Power
Company

David J VandeWalle
Nuclear Licensing Administrator

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-1636

September 16, 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 - TECHNICAL
SPECIFICATION CHANGE REQUEST -
COLD SHUTDOWN DEFINITION

Attached are three (3) original and thirty-seven (37) copies of a request to change the Big Rock Point Technical Specifications. The enclosed change provides clarification to the existing definition of cold shutdown.

The requested change is necessary to eliminate problems associated with literal translation versus compliance with the intent of the definition of cold shutdown. The change is considered to be administrative in nature, deleting only ambiguous wording which does not involve a safety consideration.

Therefore, this change has been determined to be a Class II change pursuant to 10 CFR 170.22; a check in the amount of \$1,200 is attached.

David J VandeWalle
Nuclear Licensing Administrator

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

Attachment

A001
w/check:
\$ 1200.00

8209210151 P

oc0882-0016b142

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. Change

Section 1.2.6, Cold Shutdown

Delete the word "and" from item (b).

Delete item (c) in its entirety.

II. Discussion

The above proposed Technical Specifications change is requested to provide clarification and eliminate misinterpretation through literal translation by plant and NRC staff personnel.

Section 5.2.2(b) of the Big Rock Point Plant Technical Specifications clearly identifies the requirement for a core shutdown margin verification "prior to start-up after any shutdown in which the system has cooled sufficiently to be opened to atmospheric pressure. . . and 35,000 MW_t have been generated by the plant since the previous margin demonstration." Although the intent is specified as "prior to start-up", literal translation has provided misinterpretations which would necessitate a redundant shutdown margin verification prior to fuel removal for refueling outages which occur after 35,000 MW_t. This additional margin verification does not enhance safety and is indeed unnecessary. The Standard Technical Specification (NUREG-0123) in support of this change request, does not include any contingency regarding shutdown margin verification prior to fuel removal as a condition of cold shutdown.

III. Conclusion

Based on the foregoing, both the Big Rock Point Plant Review Committee and the Safety and Audit Review Board have reviewed this change and find it acceptable.

CONSUMERS POWER COMPANY

By R B DeWitt 9/16
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 16th day of September 1982.

Helen I Dempski
Helen I Dempski, Notary Public
Jackson County, Michigan
My commission expires December 14, 1983.