



Consumers  
Power  
Company

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Nuclear Licensing Administrator

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July 28, 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 - REQUEST FOR  
CLARIFICATION - SPENT FUEL POOL  
STRUCTURAL ADEQUACY

NRC letter dated May 21, 1982 requested additional information concerning the adequacy of the Big Rock Point spent fuel pool. The letter specifically requested Consumers Power Company to provide justification for continued operation of the facility considering that safety grade equipment is not available to cool the pool and containment access could be limited by a LOCA. Our letter of June 4, 1982 provided response to the NRC letter and specifically reiterated staff concerns regarding access limitations during LOCA conditions by quoting the above "justification" statement. Your letter of July 2, 1982 enclosed the SER in support of our conclusions but neglected to address the applicability of the May 21, 1982 NRC concern - ie access limitations during a LOCA (power operation). Hence, your action statement necessitates NRC review and approval of any spent fuel pool heating analysis prior to core unload rather than prior to the start-up following the plant outage.

By telephone conversations on July 8, 1982, Mr Richard Emch of your staff was notified of our concern in minimizing the plant outage time by having the ability, to unload the core, "in part", via use of the spaces remaining in the existing Spent Fuel Pool Racks. A clarification to your July 2, 1982 letter was requested. By telephone conversation on July 9, 1982, Consumers Power Company was requested to specify our concern by letter. It is therefore the intent of this letter to request that clarification to your July 2, 1982 letter be provided to establish its applicability to "access limitations during a LOCA" as expressed by your original May 21, 1982 letter and our letter of June 4, 1982. The limitations imposed by your July 2, 1982 letter will therefore apply prior to the plant start-up following the addition of spent fuel to the pool.

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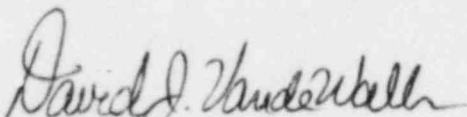
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Pool

D M Crutchfield, Chief  
Big Rock Point Plant  
S.F.P. Structural Adequacy  
July 28, 1982

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Consumers Power Company has reviewed the scope of the NRC May 21, 1982 letter and concurs with its applicability during power operations. Our review specifically considered those postulated accidents such as cask drop and fuel bundle drop which are not dependant upon plant operations. (Note that this review also assumed coincident loss of spent fuel pool cooling system.) The review concluded that during plant shutdown no postulated accident would render the containment uninhabitable for sufficient duration (>8days) for the bulk temperature of the spent fuel pool water to reach 150°F.



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