



Consumers
Power
Company

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January 6, 1983

Dennis M Crutchfield, Chief
Operating Reactor Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALIADES PLANT
DOCKET 50-155 - LICENSE DPR-06 - BIG ROCK POINT PLANT
INTERPRETATION OF TECHNICAL SPECIFICATION 6.9.2.b(2)

This is to confirm the January 3, 1983 telephone conversation with a member of your staff in which the interpretation of Technical Specification 6.9.2.b(2) was discussed. Technical Specification 6.9.2.b(2) requires a thirty-day written report for "Conditions leading to operation in a degraded mode permitted by a limiting condition for operation or plant shut down required by a limiting condition for operation." Routine surveillance testing, instrument calibration, or preventive maintenance which require system configurations as described above are exempted from this requirement so long as the test results do not reveal a degraded mode.

As a result of our review of an NRC memorandum dated September 29, 1982 from W.G. Guldemon to R.D. Walker, regarding interpretation of Technical Specification reporting requirements, Consumers Power Company has reevaluated the applicability of Technical Specification 6.9.2.b(2). In agreement with the memorandum and NRC Region III interpretation, Consumers Power Company is hereby interpreting the exemption statement of Technical Specification 6.9.2.b(2) to include any deliberate, preplanned and procedurally controlled evolution which leads to operation in a degraded mode permitted by a limiting condition for operation (LCO). These evolutions may include such activities

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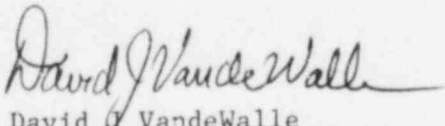
DMCrutchfield, Chief
Palisades and Big Rock Point Plants
Interpretation of TS 6.9.2.b(2)
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as removing a pump from service to allow completion of a minor modification or correcting minor component problems that do not in themselves prevent the component from performing its intended function, or placing a system in a degraded mode in order to perform testing to verify a perceived equipment failure or malfunction. This interpretation does not relieve us from our responsibility to verify the operability of redundant components, if required by Technical Specifications; or from reporting actual system or component degradation, other than that created by the planned activity, discovered while in the LCO.

We consider this interpretation to be consistent with the intent of the Technical Specifications to report degraded modes of operation which result from personnel errors, procedural inadequacies, design deficiencies or component failures. Furthermore, we conclude that it is not the intent of the Technical Specifications to report those evolutions which are deliberate, preplanned and procedurally controlled.

Effective immediately, Consumers Power Company intends to use the foregoing interpretation of Technical Specification 6.9.2.b(2).



David Vandewalle
Nuclear Licensing Administrator

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