FEB 19 1965

Docket No. 50-155

Consumers Power Company
1945 Parnell Road
Jackson, Michigan

Attention: Mr. H. R. Well
Vice President

Gentlemen:

We have reviewed Consumers' request for a change to its Technical Specifications relating to low source level startups of the Big Rock Point Nuclear Plant, dated January 13, 1965. In order to complete our evaluation of your request, it will be necessary for you to provide us with an accident analysis relating to the proposed operations. This analysis should show whether, in the event of accidental continuous reactivity insertion during such low source level startups, fuel integrity would be preserved, and should consider any particular consequences associated with this postulated accident that would be peculiar to head-off operations. Included with this information should be an indication of the rod withdrawal sequence to be used during the low source level startups, the minimum time interval between incremental rod withdrawals and the method proposed to obtain counting statistics. In addition, please provide an outline of the procedures that will be followed and the calculations to be made during head-on startup operations to correlate the head-on startups with previously conducted head-off startups, and the criteria that will be applied to determine if the correlation would be acceptable.

In addition, we believe that safety would be enhanced if the following conditions, which would supplement and/or replace those proposed in your letter for Section 7.3.2(d) of the Technical Specifications, were imposed on the low source level startup conditions:

1. The startup operations should be conducted in accordance with written procedures approved by the Consumers Plant Operations Safety Committee.

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2. The reactor loading (except for the removal of in-core nuclear instrumentation) and reactivity as affected by temperature and xenon poisoning should be the same as those obtained during the critical testing associated with the core reconstitution following the September 18, 1964 shutdown. In-core nuclear instrumentation should be utilized in such a manner that the critical multiplication and critical control rod positions can be accurately predicted.

3. A special startup in-core detector should be used for all low source level startups to provide a standard means of correlating head-off and head-on startup count rate variation with rod withdrawal and time.

4. The control rod withdrawal pattern and startup sequences should be limited to that pattern and those sequences developed during the critical testing associated with core reconstitution as described in Item 2 above.

5. A qualified reactor engineer should be in the control room during all low source level startup operations overseeing startup operations.

We would be pleased to receive your comments on the above suggested conditions.

Sincerely yours,

Original Signed by
E. G. Case

Acting for

R. L. Doan, Director
Division of Reactor Licensing

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