

CONFORMANCE TO GENERIC LETTER 83-28
ITEMS 3.1.3 AND 3.2.3
BIG ROCK POINT PLANT

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ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals from the Big Rock Point Plant for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3.

FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRC Licensing Support Section.

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CONFORMANCE TO GENERIC LETTER 83-28

ITEMS 3.1.3 AND 3.2.3

BIG ROCK POINT PLANT

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28¹ was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".²

This report documents the EG&G Idaho, Inc. review of the submittals from the Big Rock Point Plant for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28. The submittals and other documents utilized in this evaluation are referenced in section 4 of this report.

2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the reactor trip system (RTS) in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

The relevant submittals from the Big Rock Point Plant were reviewed to determine compliance with items 3.1.3 and 3.2.3 of the Generic Letter. First, the submittals from this plant were reviewed to determine that these two items were specifically addressed. Second, the submittals were checked to determine if there were any post-maintenance test items specified by the technical specifications that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or other significant information relating to the two items of concern.

The BWR Owners Group is presently addressing the Generic Letter 83-28 item 4.5.3³ which is expected to result in proposed changes to the technical specification requirements for surveillance testing frequency and out-of-service intervals for surveillance testing. The primary concern of item 4.5.3 is the surveillance testing intervals. Items 3.1.3 and 3.2.3 are specifically directed at post-maintenance test requirements. These concerns are essentially independent. However, the evaluations of these concerns are coordinated so that any correlation between these concerns will be adequately considered. Since no specific proposal to change the technical specifications have been proposed, there is no identifiable need at this time for correlating the reviews of item 4.5.3 with this review.

3. REVIEW RESULTS FOR BIG ROCK POINT PLANT

3.1 Evaluation

Consumer Power Company, the licensee for the Big Rock Point Plant, provided responses to items 3.1.3 and 3.2.3 of Generic Letter 83-28 on November 7, 1983,⁴ February 2, 1984,⁵ October 2, 1984,⁶ and _____ August 16, 1985.⁷

however these earlier submittals did not respond to 3.1.3 and 3.2.3.
In the August 16, 1985 submittal the licensee states that a review of test and maintenance programs has not identified any post-maintenance testing required by the Plant Technical Specifications that degrade rather than enhance safety.

3.2 Conclusion

The licensee's responses to items 3.1.3 and 3.2.3 meet the requirements of the Generic Letter and are acceptable.

4. REFERENCES

1. NRC Letter, D. G. Eisenhower to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. BWR Owners' Group Responses to NRC Generic Letter 83-28, Item 4.5.3, General Electric Company Proprietary Information, NEDC-30844, January 1985.
4. Consumers Power Company letter to NRC, D. J. Vandewalle to D. G. Eisenhower, Director, Division of Licensing, NRC, "Docket No. 50-155, License DPR-06--Big Rock Point Plant--Response to Generic Letter 83-28, Required Actions Based on Generic Implications of Salem ATWS Events," November 7, 1983.
5. Consumers Power Company letter to NRC, R. M. Krich to D. M. Crutchfield, Chief, Operating Reactors Branch No. 5, NRR, NRC, "Docket 50-155--License DPR-6--Big Rock Point Plant--Integrated Assessment of Open Issues and Completion Dates for Issue Resolution (Including Integrated Plant Safety Assessment Report NUREG-0828--Draft Report--Issues)--Revision 1," February 2, 1984.
6. Consumers Power Company letter to NRC, J. L. Kuemin to Director, Nuclear Reactor Regulation, NRC, "Docket 50-155, License DPR-6--Big Rock Point Plant--Integrated Assessment of Open Issues Number 99 and 101," October 2, 1984.
7. Consumers Power Company letter to NRC, R. R. Frisch to Director, Nuclear Reactor Regulation, NRC, "Docket 50-155-License DPR-6-Big Rock Point Plant--Response to Requests for Additional Information on Generic Letter 83-28," August 16, 1985.