



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 29, 1998

DOCKET
FILE
50-255

Mr. Nathan L. Haskell
Director, Licensing
Palisades Plant
27780 Blue Star Memorial Highway
Covert, MI 49043

SUBJECT: PALISADES PLANT - REQUEST FOR EXEMPTION FROM SECTION IV.E.9.d.
OF APPENDIX E TO 10 CFR PART 50 (TAC NO. M99955)

Dear Mr. Haskell:

In a letter dated October 7, 1997, the Consumers Energy Company requested an exemption from Section IV.E.9.d of Appendix E to 10 CFR Part 50. This section requires provisions for conducting monthly communications tests between the licensee's emergency response facilities and the NRC Headquarters and appropriate NRC Regional Office Operations Centers. Consumers Energy also requested approval of a change to the Palisades Site Emergency Plan to implement the requested exemption.

In our review of the exemption request, we identified that Information Notice (IN) 86-97, "Emergency Communications System," addressed communications tests with the NRC regional offices. IN 86-97 states, in part:

It should be noted that it is not necessary to conduct monthly tests of the [emergency communications] to the NRC regional office because that connection is made through the Operations Center.

In other words, the monthly communication test with the NRC Headquarters Operations Center meets the requirement for testing both the Headquarters and Regional Office Operations Center communications. Therefore, an exemption is not needed for Consumers Energy to implement a change to its monthly testing program to eliminate the direct call to the Regional Operations Center. Based on this information, you should reevaluate whether the requested change to the Palisades Site Emergency Plan would decrease the effectiveness of the plan and submit a new request if necessary. A copy of IN 86-97 is enclosed for your information.

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This completes staff action on the October 7, 1997, request. If you have any questions regarding this action, please contact Robert Schaaf at 301-415-1312.

Sincerely,

ORIGINAL SIGNED BY

Andrew J. Kugler for
Cynthia A. Carpenter, Director
Project Directorate III-1
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-255

Enclosure: IN 86-97

cc w/encl: See next page

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Mr. Nathan L. Haskell
Consumers Energy Company

Palisades Plant

cc:

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March 1998

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT
WASHINGTON, D.C. 20555

NOVEMBER 28, 1986

IE INFORMATION NOTICE NO. 86-97: EMERGENCY COMMUNICATIONS SYSTEM

Addressees:

All nuclear power reactor facilities holding an operating license and the following fuel facilities: Nuclear Fuel Services of Erwin, General Atomics, UNC Montville, B&W LCR Lynchburgh, and B&W Lynchburgh.

Purpose:

This notice is being issued to more clearly define the emergency communications system (i.e., the emergency notification system and health physics network) and to provide guidance on the operation and testing of the system. No specific action or written response is required by this information notice.

Discussion:

Title 10 of the Code of Federal Regulations, Part 50, Appendix E, Paragraph E.9, requires that the licensee have an emergency communications system. The System currently in use and acceptable to the NRC consists of two subsystems- the emergency notification system (ENS) and the health physics network (HPN). These networks are funded by the Nuclear Regulatory Commission (NRC). The ENS is an automatic ring-down service that provides dedicated telephone service to the NRC Operations Center. Originally, the HPN system was a dial-up dedicated circuit between the licensee's facilities, the regions and the NRC headquarters. The HPN requires special equipment that has been subject to reliability and maintainability problems and can no longer economically provide the necessary level of service. The NRC is replacing the original HPN equipment with normal commercial dial-up service pending a permanent solution.

The ENS portion of the emergency communications system is designed to (1) facilitate the licensee's timely notifications to the NRC of off-normal incidents affecting the facility and (2) provide information concerning the operation and status of the plant to the NRC Operations Center. The HPN is designed to provide health physics and environmental information to the NRC Operations Center in the event of an ongoing emergency. Licensees must provide qualified personnel to maintain an open, continuous communications channel with the NRC Operations Center upon request by the NRC, as required by 10 CFR 50.72(c)(3). The licensee is responsible for supplying timely, reliable information concerning an event to the NRC via the Operations Center in Bethesda, Maryland. Members of the NRC will not relieve the licensee of this responsibility.

The ENS system is exercised each morning, usually between the hours of 0400 and 0800 Eastern time, by the Headquarters Operations Officer's placement of a call to each licensed facility to collect status information. However, this call does not fully satisfy 10 CFR Part 50, Appendix E, Paragraph E.9.d., which requires each licensee to perform monthly testing from the control room, the technical support center (TSC) and the emergency operations facility (EOF).

The monthly tests of the ENS and HPN instruments from all installed locations except the NRC Resident Inspector's Office should be done at the initiative of the licensee. It should be noted that it is not necessary to conduct monthly tests of the ENS and HPN instruments to the NRC regional office because that connection is made through the Operations Center. In the case of the ENS, it is necessary for the licensee to call from each ENS location and establish contact with the NRC Headquarters Operations Officer. The Headquarters Operations Officer should be requested to return the licensee's call at each of the locations. The licensee also should be aware that on occasion it may be necessary to delay a particular test because of the heavy volume of traffic being experienced at the NRC Operations Center. All HPN instruments installed at the licensee's facilities should be tested by placing a local call to any other telephone and request a call back to ensure the instrument is working. No call to the NRC Operations Center is required. Documentation of the monthly test for the entire emergency communications system is required to be maintained by the licensee.

The following information is provided to the licensee in recognition that the new commercial service for the HPN has raised questions about its use and operation:

The new system is standard commercial telephone service and requires no complicated or sophisticated operating instruction. It is only necessary to lift the receiver and dial (301)-951-1212 to get the NRC Operations Center. This telephone is installed and operated at the expense of the NRC. Its intended use is to permit licensee personnel to transmit health physics and environmental information to the NRC through the Operations Center in Bethesda, Maryland in radiological events and exercises. No other licensee use other than required testing is permitted. Licensees must take appropriate precautions to ensure that the telephone is readily available for the purpose described here and for the monthly tests.

Licensees should ensure that the system is not used for other purposes. The development and implementation of appropriate precautions is left to the discretion of the licensee, but should be consistent with the general administrative controls and procedures of the individual facility.

The HPN telephone instrument, manufactured by ITT, is a distinct ash/almond color, and is identified as "HPN Telephone." Stickers are attached to each instrument providing the primary and backup phone numbers of the NRC Operations Center. Most facilities have installed these instruments in the TSC and EOF, although some plants will need to deviate from those locations based on where protective measure information is centrally collected.

Should either or both of the emergency communications subsystems (ENS and HPN) fail, the Operations Center in Bethesda, Maryland, should be so informed over normal commercial telephone systems by calling 301-951-0550 or one of the following backup numbers:

301-427-4056
301-427-4259
301-492-8893

A collect call to any of these numbers will be accepted. NRC will make arrangements to have the failed system returned to normal operation. At the time the failure is reported, the licensee should be prepared to supply the following information to expedite repair: (1) name of contact at location of failure, (2) commercial phone number of contact, (3) location of contact (i.e., street address, building number, room number, etc.), and (4) any other information that would expedite repair.

No specific action or written response is required by this information notice. If you have questions about this matter, please contact the Regional Administrator of the appropriate regional office or the technical contact listed below.

Edward L. Jordan, Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

Technical Contact: H. Michael Hawkins, IE
301-492-4145

Attachment: List of Previously Issued IE Information Notices

[NOTE: Attachment not provided with this enclosure.]