



**Consumers  
Power  
Company**

**COPY**

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

March 29, 1979

Director, Nuclear Reactor Regulation  
Att Mr Dennis L Ziemann, Chief  
Operating Reactors Branch No 2  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - 10 CFR 20.203  
EXEMPTION

Consumers Power Company's response to Item 2 of IE Inspection Report 78-21 dated December 8, 1978, stated that a new Limited Radiation Access Authorization (LRAA) program would be implemented to correct a certain alleged discrepancy. This program requires an exemption from 10 CFR 20.203 concerning alarm and control devices in high radiation areas.

The following method is being used to control entry into high radiation areas:

In lieu of the "control device" or "alarm signal" required by Paragraph 20.203 (c)(2) of 10 CFR 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/h but less than 1000 mrem/h shall be barricaded and conspicuously posted as high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit.\* Any individual or group or individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.

**79040300313**

\*Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirement during the performance of their radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

Acc  
S  
1/2

- c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the facility Health Physicist in the Radiation Work Permit.

The above requirements shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/h. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or the Plant Health Physicist.

This exemption is being submitted in accordance with 10 CFR 20.501. Consumers Power Company concludes that the Commission has granted this exclusion "upon its own initiative" by including it in the Palisades Draft Standard Technical Specifications dated August 31, 1978. Therefore, we intend to continue operating in this manner unless directed otherwise by the NRC.

David P Hoffman (Signed)

David P Hoffman  
Assistant Nuclear Licensing Administrator

CC: JGKepler, USNRC