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February 4, 1981

Director, Nuclear Reactor Regulation  
Att Mr Dennis M Crutchfield, Chief  
Operating Reactors Branch No 5  
U S Nuclear Regulatory Commission  
Washington, D C 20555

DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT  
DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -  
SYSTEMATIC EVALUATION PROGRAM

NRC letter dated January 14, 1981, specified seven (7) conditions to be met in order for the staff to consider the SEP Owners Group program for completing the SEP. The Owners Group program was developed in response to anticipated difficulties with the staff's proposal for redirecting the existing SEP; and has been discussed with the staff on several occasions over the past four months. The SEP Owners Group program provides that:

1. Sixty percent (60%) of the aggregate total of topic assessment for all SEP plants be completed by June, 1981.
2. Not all topics will be able to be completed by June, 1981, because of long lead times for some evaluations or lack of topic definition and criteria.
3. There will be a lead plant assigned for each topic which is not complete. This plant would work with staff reviewers to develop an SER for a topic which, in turn, would serve as a model for the assessments of that topic for the remaining SEP plants.

There is a possibility that some topics will not be addressed by June, 1981, but this should not preclude achieving the other staff goals by this date.

The nine (9) SEP Owners Group plants represent 1,233 SEP topics to be resolved. As of January 9, 1981; 504 of these topics were either deferred because they were generic issues being addressed elsewhere, or were not applicable to particular plants. Of the remainder, draft or final SERs have been issued for 207 topics. The SEP Owners would review each SER completed for another plant and apply the findings, where possible, to development of an assessment of that topic to their own plant(s). Where a topic SER does not yet exist, the designated plant would

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cooperate with and assist the NRC in developing the final SER for that topic. These SERs, in turn, would be used by the other Owners to develop the remaining plant-specific assessments for that topic. For SERs which now exist in draft form, it is anticipated that Owner reviews would be completed expeditiously; and that resulting comments would be provided to the staff to allow SER finalization. It is expected that reviews of most draft SERs in existence prior to February 1, 1981, could be completed or at least major problems could be identified within approximately 30 days of formal NRC acceptance of the Owners Group program. For those draft SERs issued after February 1, 1981, efforts will be made to complete reviews and provide comments within the normally prescribed 30-day response period.

In order for these goals to be realized by the NRC and the Owners Group, it is expected that sufficient staff resources will be dedicated to clear and concise definition of topic requirements, prompt issuance of draft SERs, and 30-day review of and response to Owner topic assessments. Consistency of review criteria and reviewers also will be of great importance to the achievement of these goals.

The following provides individual responses to each of the seven (7) conditions specified in your January 14, letter:

1. By June 30, 1981, we agree to provide for staff review a sufficient number of topic assessments, and complete reviews of outstanding draft assessments to meet the staff goal. Although Palisades is already beyond the 60% level, additional topics will be addressed to support the SEP Owners Group program. Lists of candidate topics for Palisades and Big Rock Point are included as Attachments I and II.
2. We commit to actively support staff reviews to permit June, 1981, completion of lead topic assessments for those topics assigned to Palisades and Big Rock Point. It must be recognized, however, that any long lead time analyses or lack of clear review criteria may preclude completion of some assigned topics by this date.
- 3, 4. We are concerned that the ninety-day trial period and the parallel continuation of the lead plant approach represents less than a full staff commitment to the success of a redirected SEP. We are concerned that these parallel efforts will dilute both the available staff resources and Consumers Power Company resources. It is expected that staff reviewers will be primarily oriented toward the Owners Group program, and that continuation of the lead plant concept will not affect staff responsiveness to either the rest of the SEP plants, or to the Owners Group program topics assigned to Palisades and Big Rock Point Plants.
5. We agree to provide, at least on a part-time basis, a local representative to assist with the expeditious resolution of SEP issues for Palisades. This

agreement shall be subject to the following considerations:

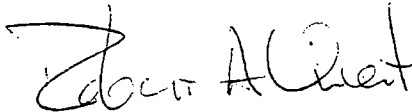
- a. It is our understanding that this representative primarily would provide advance reviews of documents such as draft SERs which are nearing completion, and generally would assist with and expedite communications for quick resolution of staff questions. This individual will not be provided to research information which has previously been docketed or is otherwise readily available to the reviewers.
  - b. Consumers Power Company reserves the right to assign different individuals to act as our local representative; ie, the individual provided initially as the Consumers Power Company representative may not be assigned necessarily for the entire period. In addition, Consumers Power Company reserves the right to vary the schedule of our representative consistent with the work load. Since greater efficiency can be realized through direct contact of our representative with both Consumers Power Company and NRC staff personnel, it is anticipated that he normally will not spend full time in Washington.
  - c. Again, in the interest of efficiency, it is important that our local representative have a consistent office in close proximity to appropriate NRC personnel, and have a consistent telephone number for rapid communications with the Project Managers, reviewers and Consumers Power Company personnel. Permanent office facilities within the Phillips Building seem to be the only reasonable alternative. Since the reason for assignment of a local representative is efficiency, it would be illogical to simply rotate this individual from vacant desk to vacant desk, or provide no facilities at all.
6. We agree to the NRC request for periodic meetings between SEP plant Owner representatives and NRC SEP management representatives to discuss progress and program planning.
  7. We agree to process draft SERs and advise the staff of comments, insofar as possible, within the normally specified 30 day response periods.

In light of the commitments that we and the remainder of the SEP plant Owners have made to the SEP program, we view the staff's present approach to the Bingham Amendment with great concern. This approach, detailed in SECY-81-13 and discussed with the Commissioners on January 14, appears to go well beyond the intent of Representative Bingham, and certainly would have a major impact on SEP plant Owners. This approach to the Systematic Safety Evaluation (aka Bingham) would result in a reevaluation of most completed SEP topics to develop additional material and to rewrite existing material into a format amenable to direct comparison with the Standard Review Plan. If this program were imposed on SEP

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plants as stated in SECY-81-13, resource constraints would not allow completion of either SEP or the Systematic Safety Evaluation within the desired schedules. Consumers Power Company will continue to monitor the progress of this issue with great interest.



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Staff Licensing Engineer

CC Director, Region III, USNRC  
NRC Resident Inspectors - Palisades & Big Rock Point Plants

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ATTACHMENT I

TOPIC LIST FOR EARLY RESOLUTION\*  
FOR PALISADES

1	II-3.A	HYDROLOGIC DESCRIPTION
2	II-3.B	FLOODING POTENTIAL AND PROTECTION REQUIREMENTS
3	II-3.B.1	CAPABILITIES OF OPERATING PLANTS TO COPE WITH DESIGN BASIS FLOODING CONDITION
4	II-3.C	SAFETY-RELATED WATER SUPPLY (ULTIMATE HEAT SINK (UHS))
5	III-4.B	TURBINE MISSILES
6	III-7.D	CONTAINMENT STRUCTURAL INTEGRITY TESTS
7	V-5	REACTOR COOLANT PRESSURE BOUNDARY (RCPB) LEAKAGE DETECTION
8	V-10.B	RESIDUAL HEAT REMOVAL SYSTEM RELIABILITY
9(LP)	VI-7.A.3	ECCS ACTUATION SYSTEM
10	VI-7.F	ACCUMULATOR ISOLATION VALVES POWER AND CONTROL SYSTEM
11	VII-3	SYSTEMS REQUIRED FOR SAFE SHUTDOWN
12	IX-3	STATION SERVICE AND COOLING WATER SYSTEMS
13	II-4.D	STABILITY OF SLOPES
14	III-3.A	EFFECTS OF HIGH WATER LEVEL ON STRUCTURES
15	VI-5	COMBUSTIBLE GAS CONTROL
16	VI-7-B	ESF SWITCHOVER FROM INJECTION TO RECIRCULATION MODE (AUTOMATIC ECCS REALIGNMENT)
17(LP)	VI-7.C	ECCS SINGLE FAILURE CRITERION AND REQUIREMENTS FOR LOCKING OUT POWER TO VALVES INCLUDING INDEPENDENCE OF INTERLOCKS ON ECCS VALVES
18	IX-1	FUEL STORAGE
19(LP)	III-7.C	DELAMINATION OF PRESTRESSED CONCRETE CONTAINMENT STRUCTURES
20(LP)	III-4.C	INTERNALLY GENERATED MISSILES
21(LP) thru 40	XV-1 thru XV-19	TRANSIENTS

LP - Indicates Palisades is the chosen lead plant under the Owners Group's lead topic concept.

\* We have agreed under Item 5 of NRC's letter of January 14, 1981 to continue to support a Palisades lead plant approach. We, therefore believe NRC will set the schedule and topic choices for Palisades. The above list contains topics which we feel can be resolved in a six-month period. It is not necessarily implied that they can all be handled simultaneously but that a sufficient number of topics can be chosen to meet NRC's goals.

ATTACHMENT II

TOPIC LIST FOR EARLY RESOLUTION\*  
BIG ROCK POINT PLANT

1	II-1.C	POTENTIAL HAZARDS OR CHANGES IN POTENTIAL HAZARDS DUE TO TRANSPORTATION, INSTITUTIONAL, INDUSTRIAL, AND MILITARY FACILITIES
2	II-3.A	HYDROLOGIC DESCRIPTION
3	II-3.B	FLOODING POTENTIAL AND PROTECTION REQUIREMENTS
4	II-3.B.1	CAPABILITY OF OPERATING PLANTS TO COPE WITH DESIGN BASIS FLOODING CONDITIONS
5	II-3.C	SAFETY-RELATED WATER SUPPLY (ULTIMATE HEAT SINK UHS))
6	III-7.D	CONTAINMENT STRUCTURAL INTEGRITY TESTS
7	V-5	REACTOR COOLANT PRESSURE BOUNDARY (RCPB) LEAKAGE DETECTION
8	VI-7.A.3	ECCS ACTUATION SYSTEM
9	VII-2	ENGINEERED SAFETY FEATURES (ESF) SYSTEM CONTROL LOGIC
10	VII-3	SYSTEMS REQUIRED FOR SAFE SHUTDOWN
11	IX-3	STATION SERVICE AND COOLING WATER SYSTEMS
12	II-4.D	STABILITY OF SLOPES
13	III-3.A	EFFECTS OF HIGH WATER LEVEL ON STRUCTURES
14	VI-7.B	ESF SWITCHOVER FROM INJECTION TO RECIRCULATION MODE (AUTOMATIC ECSS REALIGNMENT)
15	IX-1	FUEL STORAGE
16-34	XV-1 thru XV-19	TRANSIENTS
35(LP)	VI-2D	MASS AND ENERGY RELEASE FOR POSTULATED PIPE BREAKS INSIDE CONTAINMENT
36(LP)	VI-3	CONTAINMENT PRESSURE AND HEAT REMOVAL CAPABILITY
37(LP)	VI-4	CONTAINMENT ISOLATION SYSTEM

\* This list contains topics each of which we believe can be resolved in a six-month period. From this list sufficient topics will be chosen and completed to meet NRC's target of having 60% of the SEP Topics resolved by June 1981.

(LP) Means Big Rock Point was chosen as lead plant under the Owners Group's lead topic concept.