Consumers Power Company

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January 4, 1982

Dennis M Crutchfield, Chief
Operation Reactor Branch No 5
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - UPDATE OF RESPONSE
TO NUREG-0737, CLARIFICATION OF
TMI ACTION PLAN REQUIREMENTS

The NRC letter dated October 31, 1980, also identified as NUREG-0737, "Clarification of TMI Action Plan Requirements," incorporated into one document, all TMI-related items approved for implementation by the Commission at that time. Subsequent NRC letters (eg, NUREG-0696) provided additional explanation or clarification of specific NUREG-0737 items.

Consumers Power Company's initial response to NUREG-0737 was provided by our letter dated December 19, 1980. That response provided Consumers Power Company's intended actions with respect to the items of NUREG-0737. Since the December 19, 1980 submittal, Consumers Power Company has evaluated and developed in greater detail our responses to various NUREG-0737 items. Because of this updated information and unanticipated problems which have resulted in commitment date revisions, Consumers Power Company has decided to consolidate this information into a two-part formal update of our NUREG-0737 response.

Consumers Power Company's update of our response to NUREG-0737 is provided by this letter and its enclosure entitled "Consumers Power Company's NUREG-0737 Response - PALISADES NUCLEAR PLANT - December 1981 Update - Part 2." The enclosure is the second part of the two-part formal update with part one having been submitted on September 28, 1981.

The information contained in this submittal does not supersede our initial response of December 19, 1980. Rather, it provides the status and schedule, as of December 15, 1981, of Consumers Power Company's continuing efforts to address various NUREG-0737 items. Therefore, the format and pagination of this update is such that the updated response to a particular item can be

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inserted into the December 19, 1980 submittal, behind the corresponding item response.

This response is intended to provide Consumers Power Company's latest estimates of how and when various commitments will be performed. Nevertheless, this update represents Consumers Power Company's intended actions and best estimate schedules; unforeseen problems may require modifications of these actions and schedules as evaluation, design and procurement progress. Such modification to our intended actions, where significant, will be formally submitted.

David P. Hoffman
Nuclear Licensing Administrator

CC Administrator, Region III, USNRC
NRC Resident Inspector-Palisades

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CONSUMERS POWER COMPANY
Palisades Plant

NUREG-0737, Clarification of TMI Action Plan Requirements
Update of our December 19, 1980 Response to NRC letter
dated October 31, 1980

Docket No 50-255
License No DPR-20

At the request of the Commission and pursuant to the Atomic Energy Act of 1954 and the Energy Reorganization Act of 1974, as amended, and the Commission's Rules and Regulations thereunder, Consumers Power Company submits an update of our December 19, 1980 response to NRC letter dated October 31, 1980 (NUREG-0737 - "Clarification of TMI Action Plan Requirements"). Consumers Power Company's Update - Part 2 is dated January 4, 1982.

CONSUMERS POWER COMPANY

By R B DeWitt 1/4
R B DeWitt, Vice President
Nuclear Operations

Sworn and subscribed to before me this 4th day of January 1982.

Helen I. Dempski (SEAL)
Helen I Dempski, Notary Public
Jackson County, Michigan
My commission expires December 14, 1983.

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CONSUMERS POWER COMPANY'S
NUREG-0737 RESPONSE

PALISADES PLANT

DECEMBER 1981 UPDATE

I.A.1.3 SHIFT MANNING

NRC POSITION

This position defines shift manning requirements for normal operation. The letter of July 31, 1980 from D G Eisenhut to all power reactor licensees and applicants sets forth the interim criteria for shift staffing (to be effective pending general criteria that will be the subject of future rulemaking). Overtime restrictions were also included in the July 31, 1980 letter.

LICENSEE ACTION

By letter dated April 6, 1980, Consumers Power Company stated that a Shift Engineer with an SRO license will function as the second SRO and the Shift Technical Advisor in all situations. SRO training for the instructor candidates has been in progress since November 2, 1981. The STA's will enter the SRO training program in January of 1982 and are scheduled for completion in September of 1982.

A definite NRC SRO exam date has not yet been arranged due to the nature of the training program itself. The SRO program is being conducted in three phases. If the SRO candidates have not obtained a thorough understanding of the topics presented by the end of any one phase, progression into the succeeding phase will be delayed until performance is deemed satisfactory in the current phase. Therefore, the schedule for the SRO training program remains flexible. Consumers Power Company, however, expects the NRC SRO examination to be scheduled in early September of 1982 and upon NRC certification to have a second Senior Reactor Operator on shift by November 1, 1982.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

See Licensee Action above

REFERENCES

1. Letter from D P Hoffman, CPCo, to D M Crutchfield, NRC, dated December 19, 1980.

2. Letter from D P Hoffman, CPCo, to D M Crutchfield, NRC, dated April 6, 1981.

I.C.1 GUIDANCE FOR THE EVALUATION AND DEVELOPMENT OF PROCEDURES FOR TRANSIENTS AND ACCIDENTS

NRC POSITION

In letters of September 13 and 27, October 10 and 30, and November 9, 1979, the Office of Nuclear Reactor Regulation required licensees of operating plants, applicants for operating licenses and licensees of plants under construction to perform analyses of transients and accidents, prepare emergency procedure guidelines, upgrade emergency procedures, including procedures for operating with natural circulation conditions and to conduct operator retraining (see also Item I.A.2.1). Emergency procedures are required to be consistent with the actions necessary to cope with the transients and accidents analyzed. Analyses of transients and accidents were to be completed in early 1980 and implementation of procedures and retraining were to be completed three months after emergency procedure guidelines were established; however, some difficulty in completing these requirements has been experienced. Clarification of the scope of the task and appropriate schedule revisions are being developed. In the course of review of these matters on Babcock and Wilcox (B&W) designed plants, the staff will follow up on the bulletin and order matters relating to analysis methods and results, as listed in NUREG-0660, Appendix C (see Table C.1, Items 3, 4, 16, 18, 24, 25, 26, 27; Table C.2, Items 4, 12, 17, 18, 19, 20; and Table C.3, Items 6, 35, 37, 38, 39, 41, 47, 55, 57).

LICENSEE ACTION

The C-E Owners Group activities involving the development of improved emergency procedure guidelines and associated supporting analyses as described in Consumers Power Company's response to NUREG-0737 for the Palisades Plant submitted December 19, 1980, have been completed.

The revised emergency procedure guidelines are documented in Report CEN-152 "Combustion Engineering Emergency Procedure Guidelines." This report was submitted to the NRC staff for review on June 30, 1981 by the C-E Owners Group. Also included with the June 30, 1981 submittal was Report CEN-156, "Combustion Engineering Emergency Procedure Guidelines Development." This report describes the development effort that went into the preparation of those guidelines.

By letter dated September 15, 1981, D G Eisenhut, NRC, to K P Baskin, C-E Owners Group, the NRC after completing a preliminary review of documents CEN-152 and CEN-156 identified some concerns regarding the C-E Owners Group program. Therefore, they requested the C-E Owners Group to revise Reports CEN-152 and CEN-156. Modifications are being made at this time and the C-E Owners Group will continue to work along with the NRC until approval is received.

As noted in Consumers Power Company's letter dated December 19, 1980, the schedule in NUREG-0737 indicates that six months will be required for NRC staff review and approval and that another six months or more are to be allowed for revision and implementation of emergency procedures. Therefore,

the Palisades Plant Emergency Procedures will be revised, if necessary, after January 1, 1982 and the revisions implemented at the first refueling outage after July 1, 1982.

DEVIATIONS FROM AND BASIS FOR

Recommendations

See statement in Licensee Action section.

Schedule

See statement in Licensee Action section.

REFERENCES

Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

I.D.2 PLANT SAFETY PARAMETER DISPLAY CONSOLE

NRC POSITION

In accordance with Task Action Plan I.D.2, Plant Safety Parameter Display Console (NUREG-0660), each applicant and licensee shall install a safety parameter display system (SPDS) that will display to operating personnel a minimum set of parameters which define the safety status of the plant. This can be attained through continuous indication of direct and derived variables as necessary to assess plant safety status.

LICENSEE ACTION

Consumers Power Company has installed the Combustion Engineering designed Critical Functions Monitoring System and is presently evaluating the recommendation to supplement the system with additional components of the Qualified Safety Parameter Display System. An evaluation on how the C-E Critical Functions Monitoring System will meet the SPDS requirements or what modifications will be made to C-E's Critical Functions Monitoring System to meet the SPDS requirements will be submitted in early 1982.

DEVIATIONS FROM AND BASIS FOR

Recommendatons

None

Schedule

None

REFERENCES

1. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

II.B.2 DESIGN REVIEW OF PLANT SHIELDING AND ENVIRONMENTAL QUALIFICATION OF EQUIPMENT FOR SPACES/SYSTEMS WHICH MAY BE USED IN POST-ACCIDENT OPERATIONS

NRC POSITION

With the assumption of a post-accident release of radioactivity equivalent to that described in Regulatory Guides 1.3 and 1.4 (ie, the equivalent of 50% of the core radioiodine, 100% of the core noble gas inventory and 1% of the core solids are contained in the primary coolant), each licensee shall perform a radiation and shielding design review of the spaces around systems that may, as a result of an accident, contain highly radioactive materials. The design review should identify the location of vital areas and equipment, such as the control room, radwaste control stations, emergency power supplies, motor control centers and instrument areas, in which personnel occupancy may be unduly limited or safety equipment may be unduly degraded by the radiation fields during post-accident operations of these systems.

Each licensee shall provide for adequate access to vital areas and protection of safety equipment by design changes, increased permanent or temporary shielding or post-accident procedural controls. The design review shall determine which types of corrective actions are needed for vital areas throughout the facility.

LICENSEE ACTION

Consumers Power Company letter dated December 19, 1980 identified four potential areas of concern based on the results of the radiation dose calculation study. They were:

1. Direct radiation streaming into the control room and TSC from both 48-inch purge ducts, both due to containment atmosphere in the purge duct (up to the blind flange isolation) and directly from containment.

2. Direct radiation from containment penetrations and airborne radiation in the engineered safeguards room where manual operation of the safety injection system valves, CV-3189, -3190, -3198 and -3199 is required.

3. Direct radiation from containment penetrations in area of manual operator for CV-3006.

4. Access to Lab area hindered by direct radiation from containment through the personnel air lock.

The activities which were underway at the time of issuance of Consumers Power Company letter dated December 19, 1980 have been progressing and in some cases have been modified slightly as described below.

1. The design of concrete plugs to be installed in both 48-inch purge ducts is completed. The intake purge duct plug will be installed with a piping penetration that will allow for future purging of the containment, if necessary. The purge ducts will be qualified to perform as containment pressure boundary. Post-accident dose rates after installation of the

purge duct plugs will be 15 mRem/h or less in both the control room and TSC. Results from refined dose calculations have shown that it is not necessary to increase the thickness of the wall across from the control room door.

2. Safety-related motor operators and modification packages for safety injection system valves CV-3189, -3190, -3198 and -3199 have been installed.

3. The manual controller for CU-3006 has been located to an area with a lower post-accident dose rate meeting GDC-19 criteria.

4. Engineering has been completed on the design of a shield wall outside the personnel air lock to reduce predicted doses in the Laboratory areas to meet at least GDC-19 criteria. This wall will be constructed prior to January 1, 1982.

As noted in Consumers Power letter dated December 19, 1980, four additional source containing areas were identified as a result of the work performed for the report "Environment Qualification of Safety-Related Electrical Equipment." Dose calculations to the people in these vital areas have been performed and the results were found to be insignificant as compared to doses found in the original sources. No modifications, other than above, need to be performed as a result of these additional sources.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

None

REFERENCES

1. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

II.D.3 DIRECT INDICATION OF RELIEF AND SAFETY VALVE POSITION

NRC POSITION

Reactor Coolant System relief and safety valves shall be provided with a positive indication in the control room derived from a reliable valve position detection device or a reliable indication of flow in the discharge pipe.

LICENSEE ACTION

As noted in Consumers Power Company's letter dated December 19, 1980, Babcock and Wilcox is conducting the equipment qualification program for the acoustical safety/relief valve position indicating system. The program must demonstrate by testing that the equipment maintains functional operability under all service conditions postulated to occur during the installed life. The tests to be completed include both environmental and seismic conditions and are applicable to equipment both inside containment and the control room.

The projected completion date for the final qualification test report is January 1, 1983. This report will consist of two parts; part one will qualify control room components and part two will qualify in-containment components.

Human factor analysis will be done during the Control Room Design Review, Item I.D.1.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

See statement in Licensee Action section.

REFERENCES

Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

II.E.4.2 CONTAINMENT ISOLATION DEPENDABILITY

NRC POSITION

1. Containment isolation system designs shall comply with the recommendations of Standard Review Plan Section 6.2.4 (ie, that there be diversity in the parameters sensed for the initiation of containment isolation).

2. All plant personnel shall give careful consideration to the definition of essential and nonessential systems, identify each system determined to be essential, identify each system determined to be nonessential, describe the basis for selection of each essential system, modify their containment isolation designs accordingly and report the results of the reevaluation to the NRC.

3. All nonessential systems shall be automatically isolated by the containment isolation signal.

4. The design of control systems for automatic containment isolation valves shall be such that resetting the isolation signal will not result in the automatic reopening of containment isolation valves. Reopening of containment isolation valves shall require deliberate operator action.

5. The containment set point pressure that initiates containment isolation for nonessential penetrations must be reduced to the minimum compatible with normal operating conditions.

6. Containment purge valves that do not satisfy the operability criteria set forth in Branch Technical Position CSB 6-4 or the Staff Interim Position of October 23, 1979 must be sealed closed as defined in SRP 6.2.4, Item II.3.f, during operational Conditions 1, 2, 3 and 4. Furthermore, these valves must be verified to be closed at least every 31 days. (A copy of the Staff Interim Position is enclosed as Attachment 1.)

7. Containment purge and vent isolation valves must close on a high radiation signal.

LICENSEE ACTION

The following actions concerning containment isolation dependability were taken by Consumers Power Company following our NUREG-0737 response submitted on December 19, 1980:

1. Consumers Power Company is confirming, by this letter, the installation of keylocks for air supply valves CV-1813 and CV-1814. Furthermore, valves CV-1813 and CV-1814 have been added to our Technical Specifications Surveillance Program Procedure MO-29.

2. Contrary to our original position on reducing the containment isolation pressure set point as described in Consumers Power Company letter dated December 19, 1980, we will submit a Technical Specifications change request to lower the pressure set point for containment isolation to a

setting mutually agreed upon by the NRC and Consumers Power Company. We intend to submit the Technical Specifications change request by February 1982.

Upon the completion of the second action, Consumers Power Company will have completed its response to NUREG-0737, Item II.E.4.2, requirements.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

None

REFERENCES

1. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

II.F.2 INSTRUMENTATION FOR DETECTION OF INADEQUATE CORE COOLING

NRC POSITION

Licensee shall provide a description of any additional instrumentation or controls (primary or backup) proposed for the plant to supplement existing instrumentation (including primary coolant saturation monitors) in order to provide an unambiguous, easy to interpret indication of Inadequate Core Cooling (ICC). A description of the functional design requirements for the system shall also be included. A description of the procedures to be used with the proposed equipment, the analysis used in developing these procedures and a schedule for installing the equipment shall be provided.

LICENSEE ACTION

Consumers Power Company has participated over the past two years in the C-E Owners Group effort to satisfy the requirements of TMI Action Plan Item II.F.2 for C-E designed plants. The most recent submittal by the C-E Owners Group to the NRC was September 15, 1981. This submittal included Report CEN-185, "Documentation of Inadequate Core Cooling Instrumentation for Combustion Engineering Nuclear Steam Supply Systems" and Report CEN-181, "Generic Responses to NRC Questions on the C-E Inadequate Core Cooling Instrumentation."

CEN-185 identifies the C-E instrument sensor package to detect Inadequate Core Cooling (ICC) and provides an evaluation of response characteristics of potential ICC detection instrumentation. The C-E ICC sensor package consists of the following components:

1. Hot and cold leg Resistance Temperature Detectors (RTDs).

2. Pressurizer pressure sensors.

3. Core Exit Thermocouples (CETs).

4. Reactor Vessel Level Monitoring System (RVLMS) probes employing the Heated Junction Thermocouple (HJTC) concept.

As noted in Consumers Power Company's letter dated January 5, 1981, Consumers Power Company has been evaluating the functional design description of the ICC Detection System and in particular, the HJTC System as a possible component of an instrumentation system for monitoring inadequate core cooling. Having completed our evaluation, Consumers Power Company has approved the C-E Owners Group recommended ICC Detection System and we are making a commitment to its use in the Palisades Plant.

Consumers Power Company's letter dated December 19, 1980, stated that Palisades has already installed two Class 1E Subcooled Margin Monitors that meet IEEE 344-1975 and IEEE 323-1974 standards. The redundant pressure transmitters have been upgraded to Class 1E and the hot and cold leg Resistance Temperature Detectors will be upgraded to Class 1E when this qualified equipment is available to the industry.

The Heated Junction Thermocouples will be installed during the 1983 refueling outage with the Reactor Vessel Level Monitoring System operating at the conclusion of the 1983 refueling outage.

The Core Exit Thermocouples will not be upgraded to Safety grade until the 1984 refueling outage because scheduling difficulties make it impractical.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

See Licensee Action section.

REFERENCES

1. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

2. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated January 5, 1981.

II.K.2.13 THERMAL MECHANICAL REPORT - EFFORT OF HIGH-PRESSURE INJECTION ON VESSEL INTEGRITY FOR SMALL BREAK LOSS OF COOLANT ACCIDENT WITH NO AUXILIARY FEEDWATER

NRC POSITION

A detailed analysis shall be performed of the thermal mechanical conditions in the reactor vessel during recovery from small breaks with an extended loss of all feedwater.

LICENSEE ACTION

Consumers Power Company letter dated May 22, 1981, affirmed our role as an active participant in the C-E Owners Group effort to address Reactor Vessel Pressurized Thermal Shock. The C-E Owners Group is aggressively pursuing the thermal shock issue and is scheduled to complete the report entitled, "Thermal Mechanical Report - Effect of High-Pressure Injection on Vessel Integrity for Small Break Loss of Coolant Accident With No Auxiliary Feedwater," by December 31, 1981. A follow-up C-E Owners Group report to be submitted by January 21, 1981 will provide plant specific analyses, vessel capability limits, an evaluation of NRC proposed long-term solutions and a plan to fully resolve this issue.

DEVIATIONS FROM AND BASIS FOR

Recommendations

Deviations from the recommendations are not known at this time since the work scope or schedule has not yet been formulated.

Schedule

Deviations from the schedule are not known at this time since the work scope or schedule has not yet been formulated.

REFERENCES

1. Letter from B D Johnson, CP Co, to D M Crutchfield, NRC, dated May 22, 1981.

2. Letter from G S Vissing, NRC, to All Licensees represented by the C-E Owners Group, dated October 21, 1981.

II.K.2.17 POTENTIAL FOR VOIDING IN THE REACTOR COOLANT SYSTEM DURING TRANSIENTS

NRC POSITION

Analyze the potential for voiding in the Reactor Coolant System (RCS) during anticipated transients.

LICENSEE ACTION

This item is being handled through the C-E Owners Group in a parallel effort with Item II.K.2.13. The potential for voiding in the Reactor Coolant System (RCS) during anticipated transients is presently being addressed and an analysis will be submitted in conjunction with the schedule of Item II.K.2.13.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

None

REFERENCES

1. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC, dated December 19, 1980.

II.K.2.19 SEQUENTIAL AUXILIARY FEEDWATER FLOW ANALYSIS

NRC POSITION

Provide a bench mark analysis of sequential auxiliary feedwater (AFW) flow to the steam generators following a loss of main feedwater.

LICENSEE ACTION

NRC letter dated June 30, 1981 stated that no further action is necessary because the concerns expressed in Item II.K.2.19 are not considered applicable to NSSSs with inverted J-tube steam generators such as those designed by Combustion Engineering. We, therefore, consider this item to be complete.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

None

REFERENCES

Letter from D M Crutchfield, NRC, to D P Hoffman, CP Co, dated June 30, 1981.

III.A.1.2 UPGRADE EMERGENCY SUPPORT FACILITIES

NRC Position

Additional clarification will be provided in the near future.

LICENSEE ACTION

The requirements of NUREG-0737, Item II.A.1.2 were subsequently clarified by NUREG-0696, "Functional Criteria for Emergency Response Facilities", and Generic Letter 81-10, "Response to Post-TMI Requirements for the Emergency Operations Facility". Consumers Power Company responded to these requirements by letter dated June 1, 1981.

During the period of September 21 to October 3, 1981, the NRC conducted a special appraisal of the emergency preparedness program at the Palisades Plant. The appraisal included a review of our emergency facilities to determine their adequacy in meeting the requirements of NUREG-0696 for emergency facilities and equipment to support the emergency response.

The results of the review indicated that the proposed permanent Technical Support Center (TSC) does not meet the criteria of NUREG-0696 in the following areas: size; habitability; and instrumentation, data system equipment and power supplies. This open item is presently being reviewed by Consumers Power Company.

A conceptual design for a new addition to the TSC is being formulated. Upon completion of the design evaluation, Consumers Power Company's intended actions will be formally submitted. A construction and/or modification schedule, however, will not be developed until NRC approval of Consumers Power Company's intended actions.

As stated in Consumers Power Company letter dated December 19, 1980 the entire Technical Support Center will have the same radiological habitability as the control room under accident conditions. The TSC's ventilation system will be a part of the control room's HVAC system. Therefore, the TSC habitability modifications will be performed in conjunction with the control room habitability modifications. (See Item III.D.3.4 - Control Room Habitability Requirements.) We request an extension to September 1, 1983 in order to correspond to the expected completion date for the central HVAC system.

The Safety Parameter Display System requirement is addressed in Item I.D.2.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

See Licensee Action above.

REFERENCES

1. Letter from DPHoffman, CPCo, to DMCrutchfield, NRC, dated December 19, 1980.

2. USNRC NUREG-0696, "Functional Criteria for Emergency Response Facilities," dated February 1981.

3. Letter from DGEisenhut, NRC, to All Licensee of Operating Plants and Holders of Construction Permits" (Generic Letter 81-10), dated February 18, 1981.

4. Letter from BDJohnson, CPCo, to DMCrutchfield, NRC, dated June 1, 1981.

III.A.2 IMPROVING LICENSEE EMERGENCY PREPAREDNESS - LONG TERM

NRC POSITION

Each nuclear facility shall upgrade its emergency plans to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Specific criteria to meet this requirement are delineated in NUREG-0654 (FEMA-REP-1), "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparation in Support of Nuclear Power Plants."

LICENSEE ACTION

As noted in Consumers Power Company letter dated December 19, 1980, Consumers Power Company will continue to upgrade our emergency plans for the Palisades Plant to provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Offsite Dose Calculation Model

A computerized segmented gaussian model is planned for use out to the ingestion EPZ. Meterological parameters averaged over 15 minute intervals will be utilized. We are interested in providing common programming modified for site specific parameters and similar display devices at EOF's for our Palisades and Midland Plants and are in the process of investigating the feasibility of this concept.

Effluent monitor response data is expected to be obtained via the Critical Functions Monitor (CFM). The CFM currently is not scheduled for completion until September 1982. Thus, it appears at this time that an implementation date of July 1, 1982 cannot be met. We request an extension to October 1, 1982.

Meteorological Data

Backup data and meteorological forecast services currently are supplied by WSI, Inc. Data is provided in printed form and available to the Control Room, Tech Support Center, Emergency Operations Facility and General Office Control Center. Procedures allow use of the backup data in the event of primary system failure.

An onsite backup meteorology system is planned as input to the computerized dose analysis system. Such input will be limited to wind speed, wind direction and standard deviation of wind direction (σ_θ) at a 10 meter height. Data will be displayed and utilized by the dose analysis system only upon loss of primary data. Installation of equipment is expected to begin by April, 1982 and be completed by October 1, 1982. We request an extension of time to this date in order to correspond to the expected completion data for the computerized dose analysis system. We agree to maintain our current backup service until such time as the dose analysis system is complete.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

See Licensee Action above.

REFERENCES

1. Letter from D P Hoffman, CPCo, to D M Crutchfield, NRC, Dated December 19, 1980.

III.D.3.4 CONTROL ROOM HABITABILITY REQUIREMENTS

NRC POSITION

In accordance with Task Action Plan Item III.D.3.4 and control room habitability, licensees shall assure that control room operators will be adequately protected against the effects of accidental release of toxic and radioactive gases and that the nuclear power plant can be safely operated or shut down under design basis accident conditions (Criterion 19, "Control Room," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50).

LICENSEE ACTION

The Palisades Plant control room habitability modifications as described in Consumers Power Company letter dated December 19, 1980 will be performed; however, an increase in vendor lead time has delayed the installation date for the HVAC modifications from January 1, 1983 to September 1, 1983. Every effort will be made to expedite the delivery and installation of the required equipment to meet the revised commitment date of September 1, 1983.

DEVIATIONS FROM AND BASIS FOR

Recommendations

None

Schedule

No further deviations are expected. Nevertheless, if further unanticipated delays are encountered in vendor delivery of equipment, the installation date given above could be jeopardized.

REFERENCES

1. Letter from D P Hoffman, CP Co, to D M Crutchfield, NRC dated December 19, 1980.