



**Consumers  
Power  
Company**

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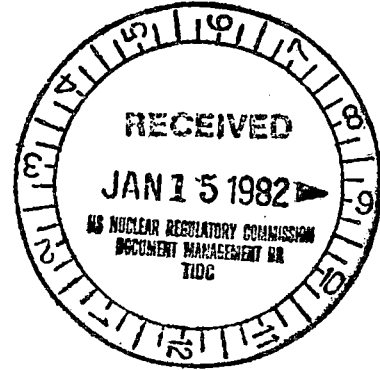
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January 4, 1982

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DOCKET 50-255 - LICENSE DPR-20 -  
PALISADES PLANT - REQUEST FOR USE OF A TEMPORARY EMERGENCY OPERATIONS FACILITY

Consumers Power Company letter dated November 6, 1981 and entitled "Response to October 7, 1981 Confirmation of Action Letter", indicated that we submit a formal request for use of the General Office Control Center (GOCC) as a temporary Emergency Operations Facility (EOF) for periods of up to six hours while establishing manning of the permanent EOF. We hereby make that request, and provide the following basis for such action.

BASIS

Consumers Power Company feels strongly that manning of onsite plant technical and operational support positions with locally available plant staff personnel has priority over immediate manning of the local EOF's. Senior plant personnel who would be capable of responding within one hour to act as EOF Director and as the required EOF support staff are not available due to the higher priorities of onsite plant support. On the other hand, qualified General Office personnel may require up to six hours travel time in severe weather to reach the permanent EOF's.

The alternative we propose is to provide temporary EOF support facilities at the GOCC until the permanent EOF is manned by assigned General Office personnel. We agree to provide plant critical function display parameters as well as the other communications and data transmittal equipment now installed at the GOCC. However, we do not expect to meet those requirements of NUREG-0696 which obviously do not apply to a temporary remote facility. For example, we propose to provide space for federal, state and local emergency personnel

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JGKepler, Administrator  
Palisades Plant  
January 4, 1982

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only at the permanent EOF. Also, equipment for monitoring GOCC radiation levels will not be installed at the temporary EOF because of its distance (greater than 100 miles from either plant site). This alternative provides the best method available to support EOF functions within one hour of an emergency event.



Brian D. Johnson  
Senior Licensing Engineer

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NRC Resident Inspector - Palisades