



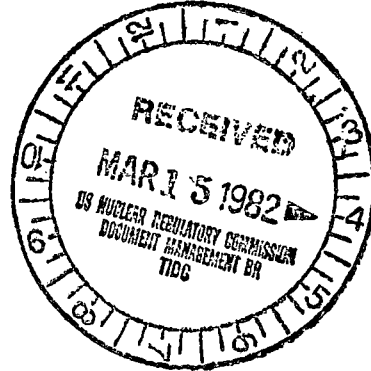
**Consumers
Power
Company**

David J VandeWalle
Nuclear Licensing Administrator

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March 12, 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 - NUREG-0737, ITEM II.F.2, INSTRUMENTATION FOR
DETECTION OF INADEQUATE CORE COOLING

Consumers Power Company submitted letters dated December 19, 1980, January 5, 1981, and January 4, 1982 for the Palisades Plant regarding NUREG-0737, Item II.F.2, "Instrumentation for Detection of Inadequate Core Cooling". Each of these letters reaffirmed Consumers Power Company's commitment to the Combustion Engineering (CE) Owners Group generic efforts on this issue. A tentative schedule for implementation of the CE Reactor Vessel level monitoring system (RVLMS) and other related modifications were contained in the January 4, 1982 letter. The purpose of this letter is to notify you that the proposed date for installation of the RVLMS (1983 refueling outage) is in jeopardy of being missed unless NRC action is taken promptly to approve the RVLMS developed by the CE Owners Group.

Consumers Power Company will continue to support the resolution of this issue through the efforts of the CE Owners Group. It is our belief that the CE proposed RVLMS meets all of the requirements of NUREG-0737 and should be found acceptable by the NRC. We are concerned, however, that an SER has not been issued for the proposed RVLMS. We are also concerned with the apparent lack of agreement between ACRS and the NRC (as evidenced by recent letters from the ACRS to the NRC on the requirements for such a system and even on the need for a RVLMS in a PWR eg. letter from ACRS to NRC dated 1/2/82). On the basis of the expressed uncertainty on this issue, Consumers Power Company is uncomfortable with committing funds to install a RVLMS. Therefore, we have told our prime contractor (Combustion-Engineering, Inc.) to stop work on the Palisades RVLMS. We feel that we should not resume work on this project until NRC approval of the CE system is available.

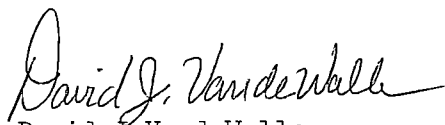
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NUREG-0737, Item II.F.2
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Regarding the effect of this delay on implementation schedules - if NRC approval is received before March 31, 1982, the CE RVLMS can and will be installed during the 1983 refueling outage. However, if the approval is received after March 31, 1982, we have no choice but to delay the installation to the following refueling outage as engineering and equipment will not be ready for the 1983 outage. In addition, it is important that the scope of the 1983 refueling outage be finalized as soon as possible to allow the development of the outage plan to proceed on schedule. Unless we receive NRC approval before March 31, 1982, we shall plan to delay installation of the RVLMS.



David J VandeWalle
Nuclear Licensing Administrator

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