



**Consumers
Power
Company**

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August 29, 1983

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

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - FIRE PROTECTION RULE - ALTERNATE SAFE SHUTDOWN CAPABILITY -
CONSUMERS POWER COMPANY'S COMMENTS TO THE MAY 26, 1983 SAFETY EVALUATION
REPORT

Consumers Power Company submitted a letter dated July 25, 1983 which requested the NRC Staff to issue a supplement to the Staff's Fire Protection Safety Evaluation Report (SER) dated May 26, 1983 to address the following:

- (a) Consumers Power Company's comments to the SER (Attachment 1 to the July 25, 1983 letter)
- (b) Disposition exemption requests (Attachments 2 and 3 to the July 25, 1983 letter)

The purpose of this letter is to advise the NRC staff that Consumers Power Company's comments (item (a) above) have been adequately resolved and that a supplementary SER addressing the comments is not necessary. The comments were resolved in a August 18, 1983 meeting between NRC Staff and Consumers Power Company representatives.

The comments previously submitted contended that the provision of 10 CFR 50, Appendix R, Section III.L were not requirements for the Palisades Plant alternate shutdown capability. Instead, it was contended that Section III.L provided guidance for an acceptable alternate shutdown capability. The original purpose in making this distinction was not to dispute the fact that Consumers Power Company committed to make operational an alternate shutdown capability which met the provisions of Section III.L. The purpose of this distinction was to clearly define Consumers Power Company's position that the provisions of Section III.L would be referred to internally as a guideline rather than requirement for any future plant modifications.

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Palisades Plant
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The basis for the previously submitted comments was that 10 CFR 50, Appendix R, Section III.L was excluded as a requirement for the Palisades Plant because the NRC Staff had issued an SER dated February 10, 1981 indicating that the Palisades Plant met the provisions of Branch Technical Position BTP APCSB 9.5-1.

The resolution of our previously submitted comments is that the Palisades Plant alternate safe shutdown capability was designated as an open item in the SER dated February 10, 1981. Therefore, the provisions of 10 CFR 50, Appendix R, Section III.L are requirements for the Palisades Plant.

The disposition of the exemption requests, item (b) above, is yet an open issue.



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