



CONSUMERS
POWER
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NRC PUBLIC DOCUMENT ROOM

DOCKET NUMBER
PROPOSED RULE FR - Misc. Topics
Reg. Guide

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

October 15, 1979



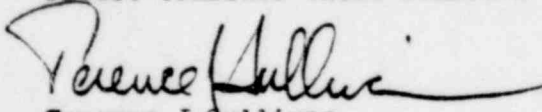
Secretary of the Commission
Att Docketing and Service Section
US Nuclear Regulatory Commission
Washington, DC 20555

The following comments concerning the draft Regulatory Guide on "Lightning Protection For Nuclear Power Plants" are presented for your consideration:

Due to the sensitivity of solid state and other control devices within a plant to the unpredictable voltages which may result from lightning storms, the intent of this Guide appears beneficial. However, the details of this Guide do not appear to adequately provide for the stated intent, that being ". . . to ensure that electrical transients resulting from lightning phenomena do not render systems important to safety inoperable or cause spurious operation of such systems."

The principal quantifiable and measurable criteria established by Regulatory Position C addresses primarily the reliability of the lightning arrester, not its ability to minimize the lightning surges that pass through into the plant. Under this criteria, arresters could be installed that (1) meet specified requirements such as discharging a 200,000 amp lightning surge and, (2) adequately protect the 345 kV GSU or station power transformer (its primary function) but, (3) allow an unnecessarily large number of high magnitude lightning surges to pass through into the plant. To remedy this situation, the Guide should be revised to address acceptance criteria for overvoltage conditions that must be diverted from impacting plant systems.

Please consider these comments in future revisions of this Guide.


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