

P.D.R.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

Docket No. 50-155

JUN 26 1980

Consumers Power Company  
ATTN: Mr. R. B. DeWitt  
Vice President  
Nuclear Operations  
212 West Michigan Avenue  
Jackson, MI 49201

Gentlemen:

This acknowledges your letter dated June 9, 1980 which responds to the non-compliance identified in IE Inspection Report No. 50-155/80-05 transmitted to you by our letter dated May 13, 1980.

We have no questions regarding your response and stated corrective actions regarding items 2 and 3. We will examine that corrective action during our next inspection.

Your response to item 1 has not totally addressed our concerns. We request that you forward, within ten days of the receipt of this letter, the information requested in the enclosure to this letter.

The information contained in the enclosure to this letter is exempt from disclosure under the provisions of Section 2.790(d) of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Therefore, the enclosure to this letter and your response will not be placed in the Public Document Room. Your response should be submitted as a separate enclosure to your transmittal letter.

Sincerely,

*J. F. Donaldson*  
J. A. Hind, Chief  
Safeguards Branch

Enclosure: As stated

cc w/encl:  
Mr. D. P. Hoffman, Nuclear  
Licensing Administrator  
Mr. C. J. Hartman, Plant  
Superintendent  
Central Files  
Reproduction Unit NRC 20b

cc w/o encl:  
PDR  
Local PDR

8007140 430

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Consumers Power Company

Docket No. 50-155

REGION III COMMENTS REGARDING  
RESPONSE TO NONCOMPLIANCE

ITEM 1 - Your positions related to this noncompliance are not fully responsive in that, at the time of our inspection, two areas of the protected area barrier (fence/isolation zone) were not under continuous CCTV surveillance, as required by your approved security plan (Section 15.1).

Your response, in part, states that CPC does not consider the motion detection system (Perimeter Alarm System) to be fully functional. We observed this fact and concur with your conclusion. We also agree that appropriate compensatory measures, as required by your security plan, are taken when the operability of the intrusion detection system is interrupted. However, the CCTV system as designed is capable of functioning independent of the motion detection system and was functional during our inspection to provide visual assessment capability. Therefore, you must conform to approved security plan commitments regarding continuous CCTV surveillance, even though the motion detection alarm feature is not functional.

We request that you describe how you plan to provide the required CCTV surveillance and advise us what measures will be taken if continuous CCTV surveillance is interrupted.

Your position regarding the relocation of cameras, that continuous CCTV surveillance may not be necessary near the Security Building, and that a taller fence (east and west warehouse) provides a greater level of protection are not discussed in your approved security plan. Therefore, if you are contemplating changes to your security plan, such changes must be submitted to NMSS/NRR for review and approval.

In summary, this office continues to hold the position that this is a valid item of noncompliance and you must conform to approved security plan commitments pending submission of appropriate revisions and their approval by NMSS/NRR.

S-PS- 50-65  
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2 Pages.  
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