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July 23, 1980

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Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
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Mr. Frederick J. Shon
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Re: In the Matter of Consumers Power Company
(Big Rock Point Nuclear Power Plant),
Docket No. 50-155



Gentlemen:

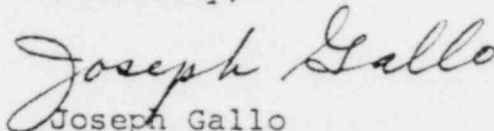
The NRC Staff served the Licensing Board and the parties with a copy of a letter, dated May 2, 1980, from Mr. Dennis L. Ziemann to Mr. David P. Hoffman of Consumers Power Company. Enclosed with the letter was an April 15, 1980 evaluation by the NRC Staff concerning the Company's compliance with certain NRC requirements resulting from lessons learned from the TMI-2 accident.

Section 2.1.6.b of the Staff's evaluation (pp. 4-5) discusses a plant shielding review of the Big Rock Point Plant that should not be confused as being applicable to any of the issues admitted in this proceeding, specifically Mr. O'Neill's Contention IIE-4. The confusion stems from the obscure identification in Section 2.1.6.b of the source term used by the Staff to calculate the radiation level of "10³R hour." This source term is an unspecified accident involving a loss of all fission product inventory in the reactor core. This source term was established by the NRC Staff as a post-TMI consideration to facilitate their overall study of reactor safety.

Contention IIE-4 places a more limited and separate issue into controversy, namely whether the Big Rock containment can contain adequately the radiation calculated to be released as a result of a credible accident involving the spent fuel pool. The maximum credible accident or design basis accident involving the spent fuel pool is the cask drop accident. The radiation level inside containment from such an accident is calculated on the basis of a source term derived from the spent fuel in the pool as distinguished from the fuel in the reactor core. Thus, the Staff's evaluation in Section 2.1.6.b is irrelevant to Contention IIE-4.

The foregoing clarification is offered at an early time in order to avoid unnecessary confusion and controversy at the hearings to be held in this proceeding. In this connection, it would be helpful if the NRC Staff took the time to explain the relevance, if any, of future "board notifications" filed in this case.

Sincerely,



Joseph Gallo
One of the Attorneys for
Consumers Power Company

JG/tjh

cc: Service List