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December 23, 1975

Docket Nos.: 50-329/330

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Consumers Power Company  
 ATTN: Mr. S. H. Howell  
 Vice President  
 212 West Michigan Avenue  
 Jackson, Michigan 49201

Gentlemen:

The enclosed comments and requests for information are in response to your letter of July 21, 1975, regarding the implementation of Regulatory Guides at your Midland Plant. These guides deal with electrical engineering.

As indicated in our letter of October 15, 1975, your response to this request for information was scheduled for January 13, 1976. Please inform us within seven (7) days after receipt of this letter of your confirmation of this date or the date you will be able to meet.

Please contact us if you have any questions regarding the information requested.

Sincerely,

*151*

A. Schwencer, Chief  
 Light Water Reactors Branch 2-3  
 Division of Reactor Licensing

Enclosure:  
 Request for Additional  
 Information

cc: See next page

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 POOR QUALITY PAGES

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OFFICE →	x7886/LWR2-3	C-LWR2-3			
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DATE →	12/23/75	12/23/75			

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MIDLAND UNITS 1 AND 2

IMPLEMENTATION OF REGULATORY GUIDES

221.0 ELECTRICAL, INSTRUMENTATION AND CONTROL SYSTEMS

221.1 Provide a list of the Regulatory Guides which are fully implemented in your system design.

221.2 The staff has reviewed the exception to position C.1 of Regulatory Guide 1.63.

A detailed description of the plant design criteria to be implemented which is to satisfy General Design Criteria 50 (in lieu of Regulatory Guide 1.63) was presented to NRC during the November 13, 1975 meeting.

A. Provide detailed description of these criteria for staff review. This response should also address the following requirements which NRC understands are included in the criteria.

1. The containment is not breached due to any electrical fault in a circuit or circuits that go through a penetration. This includes an electrical fault in the penetration assembly or directly outside.
2. Assurance that the design criteria requirements of the devices or methods included in the design which protect the penetration against failure due to any electrical faults are of a high quality and perform these functions with a high degree of confidence.
3. Assurance that an electrical fault occurring in any portion of a circuit passing through a penetration will be cleared in a manner that protects the penetration as required in (1) above, prevents loss of power to redundant safety loads, prevents further equipment damage and maintains the validity of the bases and assumptions used in the Accident Analysis.

B. It is stated that overload protection is not provided for low energy and instrumentation circuits when analysis demonstrates that a sustained maximum overload cannot cause mechanical failure of the penetration. Provide a description which identifies the analysis methods to be used for these circuits. In addition, provide a description of the types of overload protection (circuit breakers, fuses, etc.) to be utilized in the plant design for the remainder of the circuits which pass through penetrations.

C. Indicate full conformance with the remainder of Regulatory Guide 1.63 or identify and justify each exception.

- 221.3 Your response to Regulatory Guide 1.73 states that the BOP valves have been type tested to Draft 13 of IEEE Std 382-1972. Define and justify the bases for using this version of the standard vs the corrected version dated April 10, 1973. Define and describe any differences between the two versions. If the Draft 13 version type tests are less conservative than the corrected version dated April 10, 1973, justify its acceptability for use in conjunction with Regulatory Guide 1.73.
- 221.4 Due to the degree and number of areas of exception you have to Regulatory Guide 1.75, we require additional information to complete our review. As part of your response the following information should be provided:
1. Basic criteria included in the plant design,
  2. Sketches and drawings that define the areas of your design where exceptions exist,
  3. A supporting discussion that explicitly defines these areas and degree of conformance,
  4. In case of equipment in fabrication or fabricated, photographs are acceptable in lieu of sketches and drawings, and
  5. Justify exceptions to the recommendations of the Regulatory Guide.