

June 2, 1976

Docket Nos. 50-329
50-330

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

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

Gentlemen:

Thank you for your letter of March 3, 1976, regarding the format to be used and the expected content of the Final Safety Analysis Report for the Midland Plant.

We have reviewed the letter and your proposed staff position enclosed with the letter. We find that the proposed position generally follows our views on the matter of implementation of Regulatory Guide 1.70 for preparation of the FSAR for the Midland Plant. There are, however, several minor changes and one significant change as noted below and on the enclosure to this letter.

Since our meeting with you on January 13, 1976, the staff has determined that a decision on the need to have a particular piece of information or a particular analysis in the FSAR would be very difficult to make without having the FSAR in hand. The design aspects of the directly affected system or component and even of related plant systems may be important for such a determination. Further, taking a broad view, the information and analysis items in Revision 2 to Regulatory Guide 1.70 have already been determined generically to be necessary for the staff's evaluation of nuclear plant safety. Such information and analyses could be particularly important to show that a plant of older design adequately satisfies our needs for safety, especially if no changes to hardware result. In view of this, we have changed Section III A of your proposal to Section III C in our enclosed staff position.

In accordance with the enclosed staff position, we would not expect to perform a pretending review of exceptions you wish to take to the content called for by Revision 2 to Regulatory Guide 1.70. Rather, we would expect you to make these determinations and to present in the FSAR your rationale justifying why these exceptions can be taken.

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OFFICE →					
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Consumers Power Company

-2-

Please contact us if you have any questions regarding this matter.

Sincerely,

*Original signed by
Roger S. Boyd*

Roger S. Boyd, Director
Division of Project Management
Office of Nuclear Reactor Regulation

Enclosure:
As stated

ccs:
Listed on page 3

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STAFF POSITION
FORMAT AND CONTENT
OF
FINAL SAFETY ANALYSIS REPORT
FOR THE
MIDLAND PLANT, UNITS 1 AND 2

- I. The staff's review and evaluation of the operating license application for the Midland Plant will be performed using the staff's published Standard Review Plans, with due consideration being given to the status of the design, procurement and construction of the plant at the time the acceptance criteria contained in those plans became available.
- II. The FSAR shall conform to the Format contained in Regulatory Guide 1.70, Revision 2, Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants - LWR Edition.
- III. With respect to Content, the FSAR shall contain information required by Revision 2 of Regulatory Guide 1.70 with exceptions allowed under the following conditions.
 - A. If the required information is covered by a Consumers Power, Bechtel, or B&W Topical Report approved by the NRC, additional analysis beyond that contained in the Topical Report is not required unless specifically indicated in the staff's evaluation of the Topical Report.
 - B. If the subject has been resolved during the review by the staff to determine applicability of new Regulatory Guides for the Midland Plant, additional analysis beyond that contained in the finally approved Regulatory Guide Position is not required.
 - C. If required information is not available due to completion of associated engineering, manufacturing, or construction prior to issuance of Revision 2 to Regulatory Guide 1.70 and if the information would require significant engineering analysis, testing, or inspection to develop, the applicant may elect not to submit such information in the FSAR. However, in these cases, the applicant has responsibility to determine whether or not the information is necessary to demonstrate an adequate level of safety for the plant and the rationale for a decision to omit specific information must be included in the FSAR for staff review.