

Docket Nos. 50-329
and 50-330

DEC 2 1974

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

Mr. S. H. Howell
Vice President
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 44201

Dear Mr. Howell:

We have completed our reviews for the upgrading of the Electrical Power System as stated in Amendment 25 and Appendix 8A of Amendment 26 to your application for the Midland Plant, Units 1 and 2.

On pages 4 and 5 of the enclosure to the cover letter of Amendment 25, you state that certain changes intended to upgrade the electrical power system are planned and that review of these changes is not considered necessary prior to the Final Safety Analysis Report review. Since no preliminary design information on these changes was submitted for our review, it is impossible for us to comment on their acceptability at this time.

Our positions with respect to your Appendix 8A of Amendment 25 are provided in the enclosure to this letter. With the exception of these stated positions and subject to their satisfactory resolution we find your criteria for physical independence of electric systems to be acceptable.

Please inform us within two weeks after receipt of this letter of your intent regarding compliance with the positions as stated in the enclosure. We suggest that you amend your application including appropriate revisions to the Preliminary Safety Evaluation Report by February 2, 1975 with respect to these positions.

If you disagree with the staff positions relating to your application, you may have the opportunity to bring the matter to the attention of Licensing management. This may be done either orally or in writing, but you should specify the matters to be discussed and indicate your reasons for disagreement with the staff reviewers.

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Consumers Power Company

Please contact us if you have any questions regarding the staff positions.

Sincerely,

Original signed by:

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

Enclosure:
Regulatory Staff Positions

ccs: Harold F. Reis, Esquire
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REGULATORY STAFF POSITIONS REGARDING
PHYSICAL INDEPENDENCE OF ELECTRIC SYSTEMS

Consumers Power Company
Midland Plant, Units 1 and 2
Docket Nos. 50-329 and 50-330

1. In paragraph 1.5 (c) you define an isolation device to include "such devices as circuit breakers, fuses, fused disconnect switches current limiting devices, etc." This is contrary to our position transmitted to you on December 12, 1973 following our review of Amendment No. 22. It is the staff's position that these devices, as quoted above, are not acceptable isolation devices.
2. In paragraph 2.1.1.3 (a) the sentence "except for pigtails at the electrical penetrations" should be deleted. It is the staff's position that junction boxes outside the cable trays should be used for all splice requirements.
3. In paragraph 2.1.1.3 (c) the sentence "where a single layer of cable is to be installed" appears to be irrelevant. Clarify the intent and applicability of this provision.
4. The last sentence in Section 3.3 "should a fill be exceeded, the raceway section will be reviewed by a design engineer to assure that the cable can provide the required service" is not acceptable and should be removed.