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NOV 9 1973

Docket Nos. 50-329 and 50-330

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

THIS DOCUMENT CONTAINS POOR QUALITY PAGES

Gentlemen:

We have under review Amendment No. 22 to the application for construction permits and operating licenses for Units 1 and 2 of the Midland Plant. Item No. 2 of Amendment No. 22 deals with Seismic Classification and System Quality Group Classification of those water and steam containing components which are part of the reactor coolant pressure boundary and other fluid systems important to safety. Specific comments on the Piping and Vessel Code Classification (Figure 4.1-1) are listed in the enclosure to this letter.

The comments in the enclosure are based on a comparison of your Fiping and Vessel Code Classification with current Regulatory guidelines. The applicability of some of these guidelines is dependent on the state of procurement of pertinent components and materials. If on this basis you find that some of the classifications proposed in the enclosure are not appropriate, you may propose alternate classifications for our consideration.

The enclosure also includes comments on a number of systems important to safety in addition to those systems shown in Figure 4.1-1. These additional systems are: (1) Service Water, (2) Sampling, (3) Diesel Fuel Oil, (4) Instrument Air, and (5) Fuel Pool Cooling. You are required to include in your Final Safety Analysis Report detailed Piping and Instrumentation Diagrams identifying the boundary limits of each quality group of your classification scheme for each fluid system important to safety. We recommend that you submit the detailed system classification boundaries for our review prior to the commitment of resources for the construction of such systems.



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Please inform us within 15 days of the date of this letter regarding your plans for further development of Seismic and System Quality Group classifications for the Midland Plant.

Sincerely,

Original Signed

A. Schwencer, Chief Pressurised Water Reactors Branch No. 4 Directorate of Licensing

Enclosure: Piping and Vessel Code Classification

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> cc: Harold Reis, Esquire Newman, Reis and Axelrad 1100 Connecticut Ave., N.W. Washington, D. C. 20036

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POST-CP REVIEW OF INFORMATION CONSUMERS POWER COMPANY

Midland Plant- Units 1 and 2

Dockets Nos. 50-329 & 330

Review of Fig. 4.1-1, Piping and Vessel Code Classification (Amendment No. 22 only).

1. Makeup and Purification System

Those portions of the letdown line from the outermost containment isolation valve through the prefilter, pulfication demineralizer and post-filter to the makeup tank that are classified as Quality Group C (ASME Section III, Class 3) should be classified Quality Group B (ASME Section III, Class 2) and Seismic Category 1. This will also require portions of other interconnecting lines to be classified Quality Group B (ASME Section III, Class 2) and Seismic Category 1.

2. Component Cooling Water System

Those portions of the component cooling water system which service systems, portions of systems or components important to safety such as: 1) Reactor Coolant Pumps, 2) Letdown Cooler, and 3) Seal Return Cooler and are classified Quality Group D should be classified Quality Group C and Seismic Category 1.

3. Service Water System

Those portions of the service water system which service the component cooling water system or other systems, portions of systems or components important to safety should be classified Quality Group C and Seismic Category 1.

4. Sampling System

Those portions of the sampling system which form a part of the reactor coolant pressure boundary should be classified Quality Group B and Seismic Category 1. In addition, portions of the system which connect with other systems important to safety should be classified Quality Group B or C and Seismic Category 1.

5. Diesel Fuel Oil System

This system should be classified Quality Group C and Seismic Category 1.

6. Instrument Air System

Portions of this system which monitor or actuate components or portions of systems which perform a safety function should be classified Quality Group C and Seismic Category 1.

7. Liquid and gaseous Radwaste Systems

To be in conformance with Safety Guide 26 these systems should be classified Quality Group C unless an analysis is provided which demonstrates that the failure of system components will not result in calculated potential exposures in excess of 0.17 rem whole body (or its equivalent to parts of the body) at the site boundary or beyond.

In addition, to be in conformance with Regulatory Guide 1.29 these systems should be classified Seismic Category 1 unless an analysis is provided which demonstrates that the simultaneous failure of all system components would not result in conservatively calculated potential offsite exposures which are more than a small fraction of the guideline exposures of 10 CFR Part 100.

8. Fuel Pool Cooling System

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The portion of this system which performs the cooling function should be classified Quality Group C and Seismic Category 1. Those portions of the system which perform the purification and cleanup function may be classified Quality Group D.