

Comments on

Midland Plant Units 1 and 2
Consumers Power Company
Preliminary Safety Analysis Report
Amendment No. 6 dated December 29, 1969

Prepared by

Air Resources Environmental Laboratory
Environmental Science Services Administration
February 4, 1970

We do not necessarily agree with the statement in Amendment 6 that the use of the Dow Chemical Building 47 wind data would be "conservatively representative of the site meteorology". As described in the PSAR, the wind system is on top of a 30-ft mast on the western edge of the flat roof of a 3-story building. Total height above the ground is 60 feet. The area from the northwest through northeast to the southeast is an entirely built-up urban area either of the city of Midland or the Dow Building complex itself. Also to the west and south, at least for a distance of several thousand feet to the Tittabawassee River, the area is within the Dow Building complex.

The site is essentially undeveloped marshland for 1500 feet in all directions and for many miles to the southwest, south and east the terrain is rural. The critical exclusion distance of 1500 feet is towards the north since the site boundary to the south is at least 1 mile. Thus, a ground release in the critical direction (to the north) would be carried by air having a rural trajectory. In contrast, the Dow data is taken 60 feet above the ground and presumably is affected by the turbulence generated by the rough and heated urban environment.

In addition to the reservations stated by the applicant with regard to the use of Dow data (see p. 2A-32, PSAR) and those reservations as stated in our comments of Feb. 3, 1969, we feel that a surface (10 meter height) measurement of wind over the marshy terrain of the site would be considerably more appropriate for site evaluation than the Dow Building 47 data.

Reactor Development / Tech
Hilton Shaw

DATE OF DOCUMENT 3-18-70	DATE RECEIVED * 3-18-70	NO.: 900
LTR.	MEMO: <input checked="" type="checkbox"/>	REPORT: <input type="checkbox"/>
		OTHER: <input type="checkbox"/>

TO: **Morris**

ORIG.: **1** CC: OTHER:

ACTION NECESSARY ☐ CONCURRENCE ☐ DATE ANSWERED
NO ACTION NECESSARY ☐ COMMENT ☐ BY:

CLASSIF: **U** POST OFFICE
REG. NO:

FILE CODE: **50-247-50-329-130-50-261**

DESCRIPTION: (Must Be Unclassified)
Ltr re: our ltrs 11-26, 12-10-69 &
1-19 & 2-4-70...trans the following
comments prepared by ESSA

REFERRED TO	DATE	RECEIVED BY	DATE
P. Howe	3-26-70		

W/2 cys for action

1 orig ea rec'd
ENCLOSURES:
Comments on Indian Point 2, Amdt's
12 & 14.....
Comments on Midland Units 1-2, Amdt 6
Comments on H. B. Robinson Unit 2
Amdt # 11

DISTRIBUTION:

Reg file cy (3)	N. Blunt/Muller
OGC- Room F-506-A	Orig & 3 cys of
H. Price & Staff	comments on Indian
Morris/Schroeder	Point # 2
Loyd	
DeYoung	N/Blunt/Muller
Case	Orig & 3 cys of
	comments on Midland

REMARKS:
**Orig comments to be returned to
room 016....**

H. Stasis/Taddeo
W/orig & 3 cys comments
on H. B. Robinson
& orig trans memo....

orig returned 4-1-70
*orig from memo to
be filed w/ 50-261*

POOR ORIGINAL