



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 10, 1980

Docket No. 50-155

Christa-Maria
Route 2, Box 108C
Charlevoix, Michigan 49720

Dear Ms. Christa-Maria:

Your letter to me dated March 18, 1980 addressed several concerns you have about the Big Rock Point Plant. I apologize for the delay in the response to your letter. In order to provide a more complete response, we wanted to include the results of our review of Consumers Power Company's request for a delay in the implementation of certain plant modifications identified by the NRC. This review was recently completed. In particular you referred to a Consumers Power Company cost-benefit study, the safety of operation pending completion of studies and modifications, the acceptability of the Big Rock Point Emergency Plan, and a cost-benefit analysis of the proposed increase in spent fuel storage at the Big Rock Point Plant. Each of these matters is discussed below.

By letter dated February 22, 1980 and supplement dated April 2, 1980 Consumers Power Company proposed an overall risk assessment for the Big Rock Point Plant and requested deferral of ten plant modifications identified by NRC. A copy of our response dated October 14, 1980 to Consumers Power Company is enclosed and addresses this assessment and requested deferrals. None of these items are considered by us to be so critical to the assurance of public safety as to require shutdown of operating nuclear power plants until the items are implemented. It is our judgement that existing safety requirements and changes resulting from our short term lessons learned (from TMI) requirements provide reasonable assurance that the health and safety of the public will not be endangered. However, our evaluation of the TMI accident indicates it is prudent and reasonable to require an enhanced level of safety for long term operation.

You indicated that one of the items resulting from our Three Mile Island accident evaluation which is of special concern to you is the matter of insufficient shielding. The adequacy of the shielding at Big Rock is the subject of a letter sent by you to Commissioner Ahearne. Your letter is being treated as a request under 10 CFR §2.206, and a response to your request will be issued shortly.

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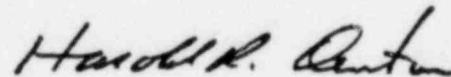
December 10, 1980

With respect to emergency planning, Consumers Power Company has an existing emergency plan which conforms to our current regulations. An upgraded emergency plan is under review and should be implemented within the next several months. We expect this upgraded Big Rock Point Emergency Plan, along with upgraded state and local emergency plans, to provide effective evacuation plans which consider a range of weather conditions, transient population and existence of nearby schools. Our evaluation of the proposed upgrading of the Big Rock Point Emergency Plan will be placed in the local public document room at the Charlevoix Library.

With respect to a cost benefit analysis regarding the proposed increase in storage capacity of the Big Rock Point spent fuel pool, the Atomic Safety and Licensing Board's memorandum and Order dated September 12, 1980, admitted Mr. O'Neill's contention which was restated by the Board as follows: "An environmental review of the proposed spent fuel pool expansion is necessary under Section 102(2)(c) of NEPA and would indicate that the environmental costs of this expansion exceed the benefits." As you know, this matter is the subject of litigation in the spent fuel pool modification proceeding.

I hope that this reply fully responds to the concerns addressed in your letter.

Sincerely,



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
October 14, 1980
letter to CPCo



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 14, 1980

Doclet No. 50-155

Mr. Russell B. DeWitt
Vice President
Nuclear Operations
Consumers Power Company
1945 Parnall Road
Jackson, Michigan 49201

Dear Mr. DeWitt:

Your letter dated February 22, 1980, indicated that Consumers Power Company intends to perform an overall risk assessment of the Big Rock Point Plant and proposed that certain plant modifications required by the NRC be deferred until a risk assessment to assess the feasibility of continued plant operation is completed. This proposal was discussed at our meeting of March 20, 1980. Your letter of April 2, 1980, summarized certain issues discussed during the March 20, 1980 meeting, provided additional information for our consideration and indicated that this effort could be completed within one year. Recent discussions with your staff indicate that the work will be completed by April 1981. Additional information was provided in your letters dated August 25, 1980, and September 2, 1980.

We have reviewed the list of ten items that you proposed to be deferred until the risk assessment is completed (Enclosure 1). Based on our review, we conclude that the ATWS recirculation pump trip modifications (Item 6) and the alternate shutdown panel (Item 4) cannot be deferred in view of the Commission Orders addressing these subjects. The Commission Confirmatory Order dated February 21, 1980, discusses the need for implementation of the ATWS recirculation pump trip modifications and establishes a schedule for its implementation, and we believe that this implementation schedule should not be modified. Requirements regarding the alternate shutdown panel are covered by the proposed Appendix R to 10 CFR Part 50. The completion date for this item shall be covered by the requirements of the proposed Section 50.48 to 10 CFR Part 50 when it becomes effective.

You also requested a delay for the construction of a meteorological tower (Item 9). We are currently developing implementation dates for meteorological sites. We expect to issue this guidance. Our current position is that by April 1981 meteorological data capability should be in place. We believe that an interim meteorological tower should be constructed by that date.

The remaining seven items deal with requirements that flow from NUREG-06

DUPLICATE DOCUMENT

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Christa-Maria

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To
Commissioner of the NRC
Harold Denton

Dear Sir,

This letter is in regard to the Big Rock Point Nuclear Plant, from which I live approx. 6 miles. As an intervenor in the spent fuel case I am familiar with the plant, its design and most of the material the NRC is providing for the public to see at the Charlevoix library.

Recently Consumers Power has released to the Press that they wish to have cost-benefit study made of all the equipment the NRC wishes to them to implement now.

From the newspaper it appears that all these request come out of the TMI incident.

From our research we know that a lot of these items were ordered long before TMI ever happened.

Some of these items are also in the contentions of Joann Bier and Shirley Johns presently before the NRC.

Your letter to them was presented to me and in my opinion it is still to dangerous to let the plant operate until all items of concern are finalized and implemented.

Of special concern to me is the matter and insufficient shielding. Also living here it is next to impossible to come up with a workable evacuation plan. We have extreme weather conditions in this area, very few highways and an almost double population in summer, sporadic increase in winter. Of immediate concern is the location of an elementary school 4 miles from the plant.

Returning to the matter of cost-benefit analysis. Recently in the course of the intervention, Consumers and the NRC felt that the Board should not rule an order for a cost-benefit analysis. Our answers try to prove why such a study should be ordered, John O. Nill a fellow intervenor did the same. All those documents should be available to you through the NRC legal staff c/o Janice Moore.

We feel it is time that the NRC orders a study made of all items, including the shielding and pool expansion, before further permit is given to operate the plant. As a ratepayer of CP I am sure that my rate will be higher no matter what. Either for implementation of all ordered items or for decommissioning the plant.

Is anybody evaluating the cost for Charlevoix county on extra safety, communication equipment, Health department step-up, etc.?

For the 1 1/2% power this company is providing Consumer Power with, all of the dangers or the precautions to an incident do just not seem to be worthwhile. People in this area survive largely from the tourist-trade and I feel that this area may become unpopular for a vacation because of the dangers Big Rock Point presents.

Thank you,

Christa-Maria
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RISK ASSESSMENT
SCENARIO - CONSUMERS
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CPC SHOULD
COMMIT

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Consumers Power Asks NRC For Support on Safety Study

By NANCY JARVIS

CHARLEVOIX — Consumers Power Co., operator of the Big Rock Point nuclear plant, has requested Nuclear Regulatory Commission support on a study of what safety equipment should be installed at the plant and at the same time keep the plant cost effective.

The utility proposes to hire a consultant to conduct an overall risk assessment by identifying the plant characteristics that have the greatest effect on public health and safety. Any proposed modifications to reduce risk would be evaluated to determine the benefits they would achieve and the costs of obtaining those benefits.

Consumers has asked for an NRC response to the proposal by April 1.

Some of the items proposed for study are the need for a monitor to measure hydrogen in the plant's containment building and a technical support center, which would provide duplicate monitoring of plant conditions.

Officials say the program is the most cost effective way to make any needed changes in the plant and get the most of our money.

Earlier this week, the NRC mandated the installation of a \$650,000 shut-off unit on the plant's recirculating pumps. Consumers may also be required to construct a three-

would require replacement power to be transmitted several hundred miles.

—The plant has operated over 17 years with many of the same staff members. "The continuity and experience of the staff is believed to be a significant contributor to overall plant safety and minimization of uncertainty to the public."

Calling the NRC "drunk with power," Selby told Big Rock employees Wednesday that NRC directives may be too expensive to warrant the continu- operation of the 18-year-old plant. Selby's

comments came in conjunction with the presentation of the President's Safety Award, an honor Big Rock's 115 employees have earned for the third consecutive year.

"We all feel we are pawns in the hands of the bureaucracy. Is there anything we can do to help?" one worker asked Selby.

"You can be safe. And do as your own desires tell you. Don't be afraid to speak up," Selby answered.

Selby said regulation is "a real problem" and one that could be solved in a few years if the regulators would just "get

out of the way." "We need more of an uprising, that would help," he said. "This drive toward absolute safety has to be modified. The NRC, OSHA (Occupational Safety and Health Administration) and EPA (Environmental Protection Administration) must all be balanced."

"Poverty can kill also..." Selby said, relating that regulations at too great a cost can be just as serious to the consumer as not enough safety measures.

