



**Consumers  
Power  
Company**

Regulatory Docket File

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

December 29, 1976

Director of Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKETS 50-155 AND 50-255 -  
LICENSES DPR-6 AND DPR-20 -  
BIG ROCK POINT AND PALISADES PLANTS



By letter dated June 7, 1976, Consumers Power Company informed the NRC that we would submit appropriate information related to the Standard Review Plan 9.5.1, "Fire Protection," by March 1, 1977. On September 28 and September 30, 1976 the NRC transmitted a copy of Appendix A to Branch Technical Position APSCB 9.5-1 and a copy of "Supplementary Guidance on Information Needed for Fire Protection Program Evaluation" for the Palisades and Big Rock Point Plants, respectively. In addition, at that same time the NRC notified Consumers Power Company that proposed Technical Specifications for the fire protection systems of our facilities should be included with our submittals. Based on our review of the information provided Consumers Power Company in September 1976, we have concluded that this information significantly alters the scope of effort that we had planned and undertaken regarding the submittal of information related to the Standard Review Plan 9.5.1, "Fire Protection." Thus, this letter is to inform you that we will be delayed in submitting an appropriate response to the Standard Review Plan, as amended by the NRC September 28 and 30, 1976 letters, until April 1, 1977. This delay is based on our estimate that the changes in scope will require an additional two to four weeks of effort.

Some of the scope changes that have caused an increase in the amount of time required to prepare the appropriate information are summarized in the following paragraphs.

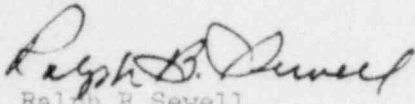
The original guidelines required a fire hazard analyses during initial plant design (original APSCB 9.5-1, Item B1 b, Page 9.5.1-24). The new Appendix A, D1 b, Page 13, changed the wording to require the hazards analyses to be made on both new construction and operating plants and to be updated after any plant modifications. The original scope of the evaluation did include a fire hazards analysis; however, the proposed hazards analysis was not to the level required by Enclosure 2 to Appendix A.

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Attachment 2, Appendix A, APCSB 9.5-1, Item 1 (c) and (d) requires quantizing the combustible material which is considerably more detailed than previously required. This section also requires submittal of plan and elevation drawings broken up into distinct fire areas and/or fire zones whereas the original guidelines permitted a description rather than drawings.

Item C1, Page 23, is new scope because deviations of fire detection and suppression systems from NFPA 72D must be identified and justified. This is a good-sized time-consuming task.



Ralph E Sewell  
Nuclear Licensing Administrator

CC: JGKepler, USNRC

NRC DISTRIBUTION FOR PART 50 DOCKET MATERIAL

TO:  
  
N. R. C.

FROM:  
Consumers Power Company  
Jackson, Michigan  
Mr. Ralph B. Sewell

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DESCRIPTION

Ltr. re their 6/7/76 ltr. and our 9/28/76 and 9/30/76 ltrs....concerning Fire Protection for Big Rock Point and Palisades Plants.  
PLANT NAME:  
Big Rock Point/Palisades  
DISTRIBUTION OF FIRE PROTECTION INFO PER S.SHEPPARD 9-22-76 FOR OPERATING REACTORS  
  
(2-P)

ENCLOSURE

ACKNOWLEDGED

DO NOT REMOVE

SAFETY FOR ACTION/INFORMATION 1/7/77 RJL

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