



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60127

MAR 25 1977

Docket No. 50-155

Consumers Power Company
ATTN: Mr. R. B. DeWitt
Manager of Nuclear
Plant Operations
212 West Michigan Avenue
Jackson, MI 49201

Gentlemen:

This is in response to your letters dated February 1, March 3, and 4, 1977, informing us of your action to correct the noncompliance identified in our letter dated January 7, 1977.

As Messrs. Hueter and Fisher discussed with Mr. Bixel on March 7, 1977, we find your 10 CFR 20.203(c)(3) infraction response unacceptable, in that accessibility to areas of possible lower radiation levels by individuals within a designated high radiation area does not, in our view, satisfy the requirement of establishing provisions to assure that no individual will be prevented from leaving a high radiation area, as set forth in 10 CFR 20.203(c)(3). The provisions for allowing an individual to be able to leave a high radiation area are to be applied to the designated control point established to meet 10 CFR 20.203(c)(2) - in your case, the locked entry door to the high radiation area. The administrative control which you suggested of locking a door or gate open upon entry does not by itself satisfy the requirement to assure positive control over subsequent entries, nor does it necessarily assure that another individual could not change the lock open condition, thus preventing the individual from leaving the high radiation area.

Exemption from the specific requirements of 10 CFR 20.203(c)(2) and (c)(3) may be pursued through a license amendment request pursuant to the provisions of 10 CFR 20.501, if you desire. Unless and until such exemption is received, steps should be taken to ensure compliance with the above regulations.

Regarding your 10 CFR 20.201(b) infraction response, we acknowledge that the magnitude of the problem involving bypass of the stack particulate filter is significantly reduced with the understanding that the activity actually counted was from the two-inch disc taken from the seven-inch-square particulate filter.

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We will examine your corrective actions regarding the 10 CFR 20.201(b) infraction and the Technical Specification 6.9.3.a(3) deficiency during a future inspection. However, as noted above we have not received an acceptable response to your 10 CFR 20.203(c)(3) infraction, as required by 10 CFR 2.201 and requested in our letter dated January 7, 1977. Please advise us within twenty days of your planned corrective action on this matter.

Your cooperation with us is appreciated.

Sincerely,

James G. Keppler
Director

cc: David A. Bixel, Nuclear
Licensing Administrator
C. J. Hartman, Plant
Superintendent

cc w/ltrs dtd 2/1 & 3/3 & 4/77:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Ronald Callen, Michigan Public
Service Commission
Anthony Roisman, Esq.,
Attorney

OFFICE →	RIII <i>WKE</i>	RIII <i>WKE</i>	RIII <i>WKE</i>	RIII	RIII	RIII
SURNAME →	Hueter/lb	Fisher	<i>WKE</i>	Hunter <i>Orb</i>	Brixius	<i>WKE</i> Keppler
DATE →	3/17/77				3/25/77	