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Docket Nos. 50-329  
and 50-330

Mr. James W. Cook, Vice President  
Projects, Engineering & Construction  
Consumers Power Company  
1945 West Parnall Road  
Jackson, Michigan 49201

Dear Mr. Cook:

Subject: Prompt Alerting and Notification of Population - Denial of Request

This is in response to your September 24, 1981 letter to Harold R. Denton, Director, Office of Nuclear Reactor Regulation, regarding an exception to the requirements for a prompt alerting and notification system for the area around the Midland Nuclear Power Station. In your letter, you proposed to provide a prompt notification system "out to at least 5 miles" rather than to the required 10 miles. Your proposed system is unacceptable for the following reasons:

- (1) The NRC staff has prepared reports NUREG-0396, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Reactors" and NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" which clearly establish the rationale for a 10 and 50 mile Emergency Planning Zone for a large light water reactor such as Midland;
- (2) These reports were used by the NRC Commissioners as the bases for the rulemaking in emergency preparedness, which became effective on November 3, 1980, and which specifically sets forth emergency planning zones (EPZs);
- (3) The precise size of the plume exposure EPZ is determined at about 10 miles by local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes and not by the source term for release (except for light water reactors less than 250 MW thermal) or probability for release;
- (4) The new rule relevant to emergency preparedness requires that Midland be responsible to ensure that an adequate state of emergency preparedness be in place for the 10 mile plume exposure EPZ and the 50 mile ingestion EPZ; and
- (5) You note that Appendix 3, Section B, of NUREG-0654 states that the basis for any special requirement exceptions must be documented. The special exceptions referred to in that statement are exceptions to the design objective to cover the 10 mile radius because of unique characteristics of the site and do not imply an exception to the 10 mile EPZ itself. In fact, specific examples are given such as extended water areas with

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Mr. James W. Cook

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transient boats or remote hiking trails. The statement refers to special exceptions to notify people in these areas that are within the 10 mile zone.

We note that the dose calculations attached to the September 24, 1981 letter did not include all of the major isotopes of NUREG-0396 and 0654 which are considered to be major contributors to dose. Table 3 of NUREG-0654 includes tellurium-132, cesium-134 and 137, and ruthenium-106. Your dose study did not include these radionuclides. Release of these semi-volatile materials is considered under core melt accidents. Also, your dose calculations only include submersion whole body doses and do not include dose contributions to the thyroid and lung, and dose contribution from ground contamination. These dose factors are significant contributors and cannot be neglected. Your dose computations also assumed containment integrity. As discussed in NUREG-0396 and NUREG-0654, the planning zones are intended to provide a base capability to deal with a wide spectrum of accidents, including core melt accidents for which containment integrity cannot be assured.

Accordingly, we deny your request for an exception and expect that the Midland Plant will establish 10 and 50 mile EPZs and provide a prompt public notification system for the entire 10 mile EPZ which meets the design objectives of Appendix 3 of NUREG-0654, and fulfill the requirements of the regulations. The system shall be fully functional before a license is granted. In addition, a public education and information system shall be made available to the permanent and transient population within the 10 mile EPZ.

If you have any questions regarding our position on this subject, please contact Brian Grimes, Director, Division of Emergency Preparedness, at (301) 492-4614.

Sincerely,

Robert L. Tedesco, Assistant Director  
for Licensing  
Division of Licensing

cc: See next page

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MIDLAND

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