



Consumers  
Power

**POWERING  
MICHIGAN'S PROGRESS**

Big Rock Point Nuclear Plant, 10269 US-31 North, Charlevoix, MI 49720

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(58FR 58804)

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Patrick M Donnelly  
Plant Manager

December 28, 1993

Secretary  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Services Branch

The following comments represent the view of Consumers Power Company's Nuclear Operations Department.

10CFR73.55(c)(9)(i)

"Each licensee authorized to operate a nuclear power reactor shall:

By (insert 90 days from effective date of rule) submit to the Commission a summary description of the proposed vehicle control measures as required by 10CFR73.55(c)(7) and the results of the vehicle bomb comparison as required by 10CFR73.55(c)(8). For licensees who choose to propose alternative measures as provided for in 10CFR73.55(c)(8), the submittals must include the analysis and justification for the proposed alternatives;"

The Amendment states that licensees are required to submit a summary description of the vehicle control measures within 90 days from the effective date of the rule.

Due to the complexity of calculations, design and planning it appears this is not a realistic time frame to perform analysis and develop a comprehensive, cost-effective plan. We suggest this be increased to 120 days.

10CFR73.55(c)(9)(ii)

"By (insert 360 days from final rule effective date), fully implement the required vehicle control measures, including site-specific alternative measures as approved by the Commission;"

The 360 day time frame for full implementation of this amendment also appears unrealistic. The three phases to implementation include (1) plan development; (2) review and approval by the Nuclear Regulatory Commission; and (3) design, procurement and construction. The plan development (as currently proposed) is slated for 90 days, however the time frame for the review and approval process remains an unknown at this time. The review of over 60 different site plans could take much of the remaining 280 days which the Nuclear Regulatory Commission had slated for licensee construction/implementation. Further, due

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to the limited number of vendors manufacturing some of the equipment necessary to implement this rule there may be long procurement periods.

Another factor which would affect construction of the vehicle protection system is the adverse weather conditions at some northern sites. Frozen ground, ice and snow could prevent or slow construction activities. We suggest this paragraph be revised to state that licensees have 360 days to implement this rule after plan approval by the Commission.

Big Rock Point Plant Only, Pg 58805 Discussion

Decommissioning Reactors

This paragraph states that licensees who plan to decommission in the near future may be able to receive a full or partial exemption from the rule. Due to our end of license being approximately five or six years after the implementation date of the rule, we request that the Nuclear Regulatory Commission provide an interpretation of "decommission in the near future."

Sincerely,

*Michael D. Bourassa*

Michael D Bourassa  
Senior Licensing Engineer

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cc: PMDonnelly, Consumers Power Company  
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