



Consumers
Power
Company

James W Cook

Vice President - Projects, Engineering
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August 26, 1982

Harold R Denton, Director
Office of Nuclear Reactor Regulation
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND NUCLEAR COGENERATION PLANT
MIDLAND DOCKET NOS 50-329, 50-330
REACTOR VESSEL HEAD VENT
FILE: 0505.16 SERIAL: 18434

The Safety Evaluation Report for the Midland Plant (NUREG-0793) stipulates that Consumers Power Company is required to install a vent on the reactor vessel head in accordance with 10 CFR 50.44. Our technical position has been that venting of the reactor vessel head is unnecessary since the other reactor coolant system vents perform the desired function of ensuring venting of the core cooling circuit. This position predates the cited regulation as documented in the Responses to Post TMI-2 Lessons & Events volume of the FSAR.

With respect to the question of instrumentation to detect the approach to inadequate core cooling, our response has been to provide a subcooling margin monitor, full range hot leg level monitoring, and upgraded core exit thermocouples.

In response to the Staff's position stated in the SER, sections 4.4.4 and 5.4.7 Consumers Power Company proposes to provide a vent connection between the top of the reactor vessel head, and the top of one of the hot legs as conceptually shown in the attached sketch, Figure 1. The line would provide for venting and purging of the reactor head volume. The vent on the hot leg would allow venting from the system of any non-condensibles. By providing the proposed connection, the hot leg level monitoring system would also provide level monitoring for the reactor vessel to the bottom of the hot leg. CPCo believes that this design, because of its inherent simplicity has sufficient merit to warrant continuation with detailed design and analysis. Our projected schedule would ensure installation by the first scheduled refueling outage, however we will endeavor to complete design and installation prior to fuel load, if practicable.

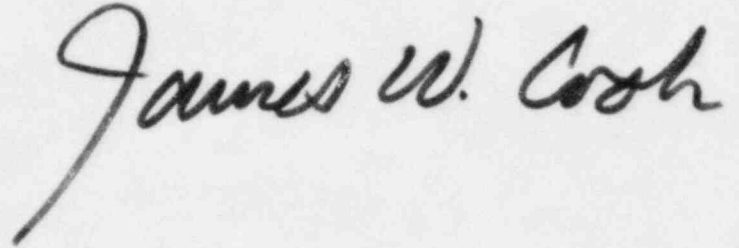
It is our interpretation of current regulations that a reactor vessel head vent is not specifically required if other system venting is provided.

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However, since the staff believes such a vent is specifically required, we request an exemption from the regulation until the first refueling outage.

A response indicating your concurrence with the proposed course of action to resolve these open issues would be appreciated.

A handwritten signature in black ink that reads "James W. Cook". The signature is written in a cursive style with a large, sweeping initial "J".

JWC/JRW/fms

CC RJCook, Midland Resident Inspector
RHernan, US NRC
DBMiller, Midland Construction (3)
RWHuston, Washington

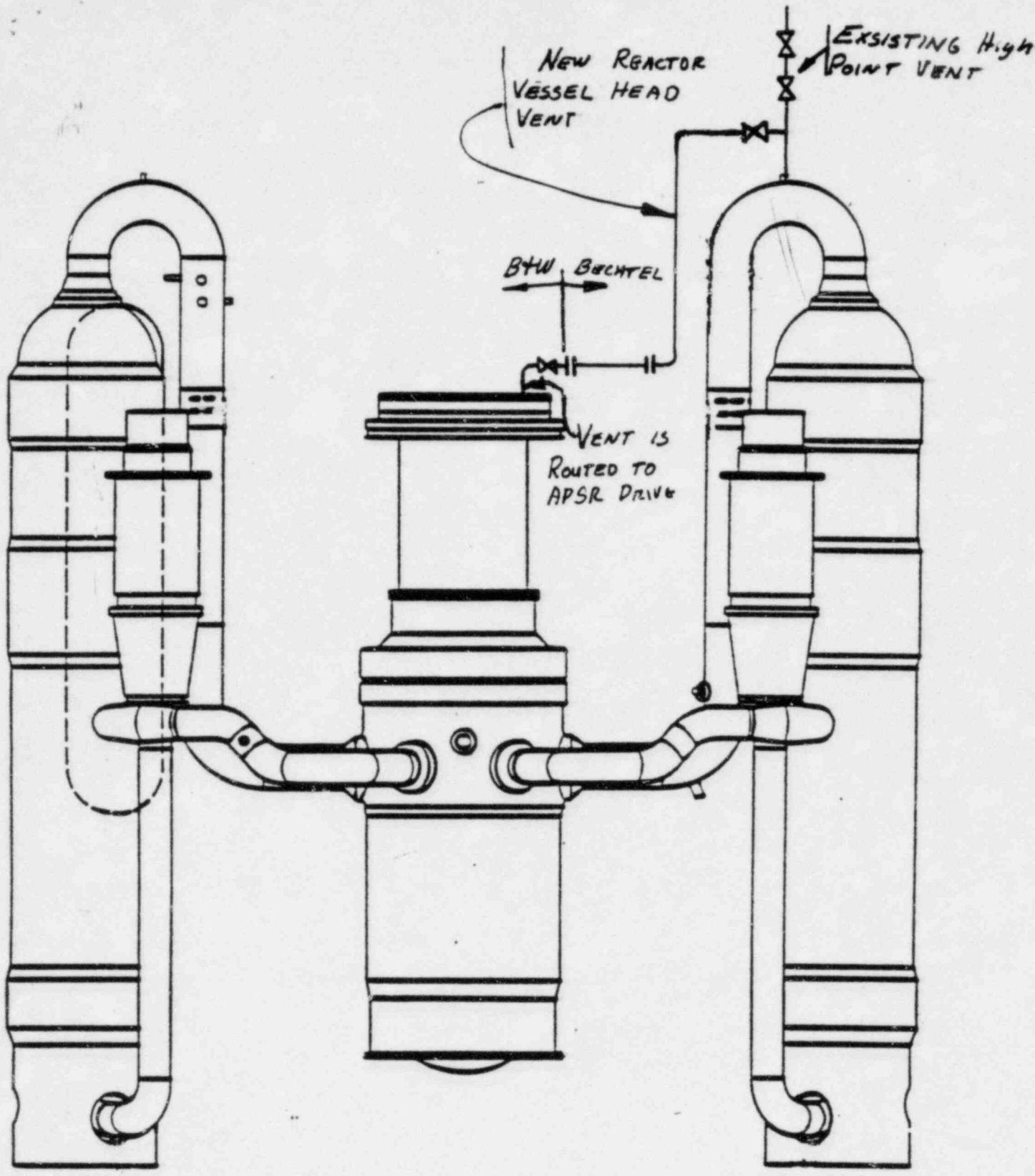


Figure 1


CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 18434 Dated August 26, 1982

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits response to SER Outstanding Item (9), Section 5.4.7 and License Condition (2), Section 4.4.4.

CONSUMERS POWER COMPANY

By


J. W. Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 30 day of August, 1982


Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984.