



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

*Warnick*

July 27, 1983

Mr. C. William Wagner, Director  
Complaint Analysis Division  
Bureau of Commercial Services  
Michigan Department of Licensing  
and Regulation  
P.O. Box 30018  
Lansing, MI 48909

Dear Mr. Wagner:

This is in response to your letter dated July 8, 1983, to Mr. J. G. Keppler, and our telephone conversation of July 26, 1983, regarding ~~engineering problems associated with the Midland and Palisades Nuclear Power Plants.~~

As we discussed, the Local Public Document Rooms (LPDRs) for Midland and Palisades, located at the Grace Dow Memorial Library, 1710 South Saint Andrews Road in Midland, and the Kalamazoo Public Library, 315 South Rose Street in Kalamazoo, respectively, should contain the information you desire.

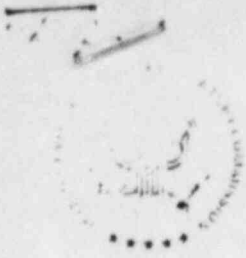
Please let me know if I may be of further assistance regarding your information needs.

Sincerely,

William B. Menczer, Director  
State and Government Affairs

cc: J.G. Keppler, RIII  
J.D. Saltzman, OSP  
 R.F. Warnick, RIII

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OCT 29 1982

MEMORANDUM FOR: T. Novak, Assistant Director for Licensing, Division  
of Licensing

FROM: R. F. Warnick, Acting Director, Office of Special Cases

SUBJECT: REGULATORY GUIDE 1.29 EXCEPTIONS

During a routine inspection of Midland the inspectors determined that one of the emergency diesel generator exhaust system hangers was not constructed according to the drawings. The welds attaching the hanger to structural support steel were found to be inadequate. This hanger is massive, is directly over the diesel, and is classified as "non Q". If the welds failed and the hanger dropped on the diesel, it could make the diesel inoperative.

The inspectors informed the licensee that the above condition does not meet the requirements of Regulatory Guide 1.29, Position C.4. Position C.4 states, in part, that the quality assurance requirements of Appendix B should be applied to all those activities affecting the functions of those portions of non-safety systems whose failure could reduce the functioning of any plant safety system. A copy of the Regulatory Guide is enclosed.

The licensee's position was that the FSAR, Appendix 3A, took exception to Regulatory Guide 1.29, Position C.4, and therefore, this hanger does not have to be constructed under Appendix B criteria. A copy of Appendix 3A is enclosed.

Subsequently, the inspectors had discussions with Darl Hood and others of your staff about the exhaust system hangers. The inspectors were informed that not only are the hangers considered to be "Q", but the diesel exhaust piping itself is also considered to be a safety related component.

The licensee's position was that the exhaust piping is a non-safety related component of the emergency system.

*Handwritten number: 8312140130*

T. Novak

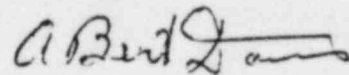
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JUL 29 1982

Region III agrees with your staff. In addition, we believe the requirements of Regulatory Guide 1.29, Paragraph C.4, should be applicable to Midland and exceptions to this position should be limited rather than plant-wide.

We request clarification of the NRC position. Does NRR accept the FSAR, Appendix A exception to RG 1.29, C.4? Are the emergency diesel generator exhaust system and hanger safety-related?

If you have any questions, please contact either Wayne Shafer or myself.



*f* R. F. Warnick, Acting Director  
Office of Special Cases

Enclosures: As stated