



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

Patrick M Donnelly
Plant Manager

December 22, 1995

Mr. Seymour H. Weiss, Director
Non-Power Reactors and Decommissioning
Project Directorate
Division of Project Support
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Docket No. 50-155 - License DPR-6 - Big Rock Point Nuclear Plant
RESPONSE TO INTERIOR DEPARTMENT COMMENTS ON BIG ROCK POINT
NUCLEAR PLANT ENVIRONMENTAL REPORT

We appreciate the comments of the Department of Interior and concur with their recommendations for additional review of then-current Federal and State of Michigan listings of threatened and endangered species prior to initiating decommissioning activities which could endanger listed species. This process is consistent with the future survey plans we discuss in Section 3.2.3 of the Environmental Report.

Consumers Power Company maintains close contact with both Federal and State authorities with respect to listed species and the rules governing their protection. Such routine communications are required in the course of business which involves state-wide activities at nuclear, fossil and hydro facilities, as well as electric and gas transmission and distribution work. This routine interaction will continue throughout the decommissioning process.

With respect to the recommendation for periodic inspections and maintenance of fuel storage and hazardous material facilities, Consumers Power company is committed to these activities. Radiological and non-radiological source monitoring will continue throughout the SAFSTOR interval as discussed in Environmental Report Section 4. In addition technical specifications will identify specific surveillance requirements which are applicable to decommissioning.

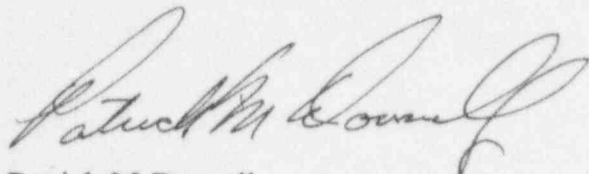
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Please contact James S. Rang at 616 547-8354 with any questions you may have about this response.

A handwritten signature in cursive script, appearing to read "Patrick M. Donnelly".

Patrick M Donnelly
Plant Manager

cc See next page

Attachment

**Big Rock Point Nuclear Plant
Response to Department of Interior - Environmental Report**

3

cc:

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4351

U.S. Nuclear Regulatory Commission
Resident Inspector Office
Big Rock Point Plant
10253 U.S. 31 North
Charlevoix, Michigan 49720

Ms. Linh Tran, NRC Project Manager
US Nuclear Regulatory Commission
Mail Stop OWFN/13-D-18
Washington, DC 20555

Mr. Robert A. Fenech, Vice President
Nuclear Operations Department
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Muskegon, MI 49440

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Nuclear Awareness Project
Box 2331
Oshawa, ON L1H 7V6

Attachment 1

**CONSUMERS POWER COMPANY
BIG ROCK POINT
Docket No 50-155**

Department of Interior Comments

Submitted December 22, 1995

3 Pages



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001
November 8, 1995

Mr. Patrick M. Donnelly
Plant Manager
Big Rock Point Plant
Consumers Power Company
10269 U.S. 31 North
Charlevoix, Michigan 49720

SUBJECT: TRANSMITTAL OF COMMENTS ON DECOMMISSIONING PLAN

Dear Mr. Donnelly:

Enclosed please find a copy of decommissioning plan comments received from United States Department of Interior.

Sincerely,

A handwritten signature in dark ink, reading "Richard F. Dudley, Jr.", is positioned above the typed name and title.

Richard F. Dudley, Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-155

Enclosure:
As stated

cc w/enclosure:
See next page

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United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, D.C. 20240

OCT 24 1995

In Replay Refer To:
ER 95/445

Mr. Seymour H. Weiss, Director
Non-Power Reactors and Decommissioning
Project Directorate
Office of Nuclear Reactor Regulation (#50-155)
Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Weiss:

The Department of the Interior has reviewed the Environmental Report for the Decommissioning of Big Rock Point Nuclear Plant Project, Charlevoix County, Michigan prepared by Consumers Power Company (CPC) for the Nuclear Regulatory Commission (NRC) and has the following comments.

Endangered Species Act

Our U.S. Fish and Wildlife Service (Service) concurs with the identification on pages 3-18 and 3-19 in the report of Federally listed species that may presently occur at the project site. As pointed out in the document, CPC will not implement most of the proposed actions for several years. Therefore, the Service recommends that CPC request a species list from the Service's East Lansing Field Office and conduct surveys for listed species prior to initiating any decommissioning activities.

The document states that spent fuel will be stored for more than 20 years under the proposed alternative. Accordingly, we recommend that CPC conduct periodic inspections and maintain the integrity of all structures that contain hazardous materials as long as necessary, as well as conduct radiological monitoring during the wet and dry dormancy periods. The decommissioning process should proceed as safely as possible due to the potential for contamination of Lake Michigan waters and sensitive Great Lakes shoreline habitat.

If the project is modified or new information about the project becomes available that indicates listed or proposed species may be affected, CPC should reinitiate consultation with the Service. The Service further advises that should it list or propose to list any species occurring in the project area as a threatened

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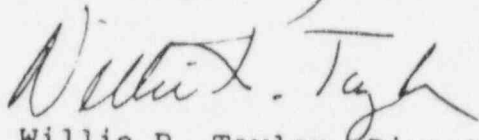
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or endangered species prior to completion of the project, the Federal project sponsor, the NRC, would also be required to reevaluate its responsibilities under the Endangered Species Act of 1973, as amended. Since data on threatened and endangered species is updated continually, the Service recommends that CPC request annually an updated Federal list of the species occurring in the project area. You may contact Mr. Kevin Stubbs of the Service's East Lansing Field Office - Telephone: 517-337-6650 directly.

In addition, we also recommend that CPC contact the Michigan Department of Natural Resources for information on state-listed species in the project area and review its responsibilities pursuant to State of Michigan Public Act 204 (Endangered Species Act of 1974). The State Endangered Species Act requires permits in advance of any work that could potentially damage, destroy, or displace state-listed species.

We hope these comments will be helpful to you.

Sincerely,



Willie R. Taylor, Director
Office of Environmental Policy
and Compliance

bcc:
REO/PHI
L.K. Stone