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**DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT  
MAXIMUM HYPOTHETICAL ACCIDENT (MHA) ANALYSIS - CONTROL ROOM  
HABITABILITY ISSUE RESOLUTION**

By letter dated June 14, 1991, Consumers Energy Co. (then Consumers Power Company) notified the NRC that the Maximum Hypothetical Accident (MHA) analysis of record for Palisades did not account for all potential radioactive release paths. A Justification for Continued Operation (JCO) was contained in the June 14, 1991 submittal and revised on January 10, 1992, to support continued operation until the MHA could be reanalyzed. By letter dated January 9, 1995, the NRC approved the JCO and issued a corresponding Safety Evaluation Report (SER). By letter dated January 24, 1996, Consumers Energy submitted, in accordance with this SER, the new MHA and associated Control Room Habitability analysis of record for Palisades. This analysis fulfilled the requirement of the SER and brought Palisades into compliance with the Standard Review Plan (SRP). The results of the revised MHA analysis and associated Control Room Habitability analysis were incorporated into the FSAR in 1996 as part of Revision 18. Revised Control Room Habitability analyses for other applicable events have also been incorporated into the FSAR since that time.

The analyses of record for offsite dose consequences were performed using atmospheric dispersion factors (X/Qs) derived in accordance with Regulatory Guides 1.4 and 1.145. The results of these are within 10CFR100 requirements and NRC review is not required. The Control Room Habitability analyses of record have used atmospheric dispersion factors developed from site-specific wind tunnel testing. In a telephone discussion on July 19, 2000, the concern was expressed that a sufficient body of wind tunnel test data was not available to permit a comprehensive NRC review of methods for translating wind tunnel test results to X/Q values. Consumers Energy agreed to evaluate the staff's concern and consider other alternatives that might be available. While we remain confident that all GDC-19 requirements for Control Room Habitability continue to be met for all relevant events at Palisades, we understand the issue.

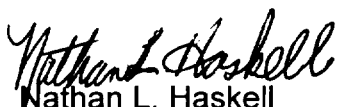
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Consumers Energy is aware that joint NRC and industry activities are underway to develop generic guidance for control room ventilation system testing, maintenance, and habitability analysis methodologies. Consumers Energy is participating as a member of the NEI Control Room Habitability Task Force in the development of that guidance, currently scheduled to be issued as NEI 99-03. When that guidance is issued by NEI and endorsed by the NRC it is our intent to review the Control Room Habitability analyses of record for all applicable events and revise those analyses as required. This review will include consideration of the recently approved alternate source term methodology discussed in Regulatory Guide 1.183 and the new X/Q methodology discussed in NUREG/CR-6331. Revised Control Room Habitability analyses for Palisades that reflect the results of these ongoing activities, when available, will be provided for NRC review as appropriate. Accordingly, it is requested that NRC expend no additional resources on reviewing the January 24, 1996, Control Room Habitability analysis submittal and the associated TAC number be closed.

#### SUMMARY OF COMMITMENTS

This letter contains 1 new commitment and no revisions to existing commitments.

Following issuance by NEI and endorsement by NRC of revised guidelines for Control Room Habitability analyses, existing Palisades Control Room Habitability analyses of record for radiological releases will be reviewed in light of the new guidelines and revised as required. Revised analyses will be provided for NRC review as appropriate.



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