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May 11, 1977

Mr James G Keppler
US Nuclear Regulatory Commission
799 Roosevelt Road
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DOCKET 50-155 - LICENSE DPR-6 -
BIG ROCK POINT PLANT - RESPONSE
TO IE REPORT 050-155/77-04

By letter dated April 19, 1977, Consumers Power Company was requested to respond to certain items addressed in IE Inspection Report 050-155/77-04. The purpose of this letter is to provide the requested responses.

Item

"A facility change for ventilation patterns in the access control area, decontamination area and laundry room has not been completed."

Response

The facility change referred to above was determined to require major modifications to the plant ventilation system and not cost effective. The ventilation pattern for these areas is adequate for normal plant operations and, in fact, has been adequate for all applications in the history of the plant. However, should a severe personnel decontamination problem arise, the ventilation patterns could present a problem in terms of the potential spread of airborne activity. Therefore, Consumers Power Company is currently evaluating the establishment of an independent decontamination area to be used in the event of such an emergency. This area will be equipped with the necessary equipment for personnel decontamination, and will be in an area of adequate ventilation. The evaluation will be complete and necessary procedures implemented by July 1, 1977.

Item

"The license is in the process of completing a study to determine radiation shine dose from the containment sphere and containment penetration leakage which approximates a ground release in order to determine the isopleths necessary in the Site Emergency Plan.

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"Neither the EPA nor the State of Michigan Protective Action Guides for consideration of action levels have been incorporated into the Site Emergency Plan."

Response

The Big Rock Point Final Hazards Summary Report, Section 13, establishes off-site whole body and thyroid infinite time doses to be 0.6 Rem and 4 Rem, respectively, for the postulated MHA, 10% core meltdown. Since these projected doses are small relative to both 10 CFR 100 limits and State action guides, the investigation into the need for additional decisional aids had, in the past, been given a low priority. The study referred to in past inspection reports has concentrated on the determination of radiation levels within the plant due to direct shine since the in-plant levels are substantially more significant than the off-site doses. This study still requires considerable effort but will be completed by the end of the year. However, the portion of the study involving off-site dose assessment will be completed by mid-August 1977. At that time Consumers Power Company will submit to the Commission the results of the study. Also at that time, the State of Michigan Emergency Classification Guide will be incorporated into the Site Emergency Plan. The State Classification Guide is based upon the EPA Protective Action Guidance, and utilizes event classifications consistent with the State's overall emergency response plan. Since the largest portion of our contact during a plant emergency would be with State and local support agencies, and since the State, rather than Consumers Power Company, determines the need for, and implements, off-site protective actions according to State requirements, it is prudent that the State Guides, rather than EPA Guides, be provided in the Big Rock Point Site Emergency Plan and, therefore, any changes will be made accordingly.

In recognition of the increased complexities of radiological emergency plan implementation and training, Consumers Power Company hired, as of May 1, 1977, an individual with an extensive background in emergency services. The sole responsibility of this supervisor will be to ensure adequacy of procedures, training and coordination relative to Site Emergency Plans and Procedures. We anticipate that this addition to the General Office staff will assist in expediting completion of the emergency plan items remaining open with regard to Big Rock Point.

There is one further item pertaining to IE Report 77-04 that Consumers Power Company would like to address at this time. This concerns the conformatory measurements, specifically Item 5.c. One portion of this item states: "The analytical contractor failed to properly quantify Sr-89....No explanation was available for the disagreement reported by the analytical contractor."

Investigation into this matter revealed that the reported value had not been decayed correctly. The reported value represented the concentration as of December 31, 1976 while the NRC values represented an October 1, 1976 analysis. Decay correcting the contractor's Sr-89 value to October 1 gives a concentration

of $(5.3 \pm 1.0) \times 10^{-3}$ $\mu\text{Ci/ml}$. This concentration agrees with the NRC value of $(4.9 \pm 0.15) \times 10^{-3}$ $\mu\text{Ci/ml}$. Therefore, the overall results of the conformatory measurements improves to 81% agreements or possible agreements and 19% disagreements.

David A. Bixel

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