

Christa-Maria

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4.23.81

Dear Commissioner Gillinsky,

It is with great hope that I read your speech before
MSU April 9, 81.

With that hope and my last remnant of faith in the NRC
do I write you.

For two years I have been involved as an intervenor in the
spent fuel case pertaining to the Big Rock facility in
Charlevoix, a lot of learning about the regulatory process
has come out of that.

Some of the decisions rendered by the NRC as the recent

- no need for EIS as ordered by the ASLB
- passing a dangerous pamphlet conc. emergency planning

and topping it finally off with what looks like a per-
mission from the NRC for Consumer Powers to do their own
thing on orders issued pertaining to TMI should warrant
a full Commission Hearing.

Nowhere, for instance in the PRA study is consideration
nor room for a worst possible accident where the spent
fuel pool is involved. Big Rock's spent fuel pool is
in the same containment as the reactor and the spent fuel
pool is not connected to the diesel back-up in case of
loss of offsite power.

There is more that should be considered, like the special
plutonium bundles at Big Rock, the cost-benefit factor, etc.

The matter at heart in the PRA study is cost-benefit and
not the safety of employees or residents, can the NRC accept
such a compromise?

I am sorry that my english is insufficient to maybe inter-
pret my concerns more urgently or eloquently, however some
of the enclosures will help to explain the matter.

Please reply,

Thank you,

Christa-Maria

6 Enclosures



W R ex parte 2

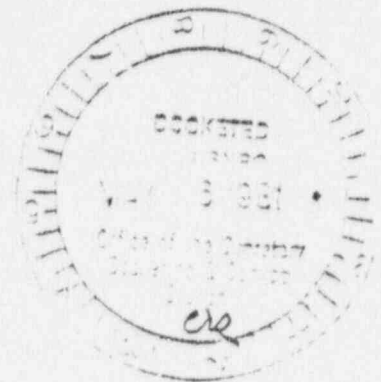
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 1 1981

Docket No. 50-155



LICENSEE: Consumers Power Company

FACILITY: Big Rock Point Plant

SUBJECT: SUMMARY OF MEETINGS WITH CONSUMERS POWER COMPANY HELD
ON MARCH 17 AND 18, 1981 TO DISCUSS THE BIG ROCK POINT
PROBABILISTIC RISK ASSESSMENT

On March 17 and 19, 1981, the NRC staff met in Bethesda, Maryland with representatives of Consumers Power Company and their consultants. The purpose of the meetings was to discuss the results of the licensee's Probabilistic Risk Assessment (PRA) of the Big Rock Point Plant. A list of attendees is enclosed (Enclosure 1).

The licensee explained that the motivation for the PRA study was their concern regarding projected capital expenditures at the Big Rock Point Plant. These expenditures are exceeding six million dollars per year whereas the licensee's analysis shows that the economic break even point, depending on number of years of plant operation, is between one and four million dollars per year. Consumers Power Company feels that they cannot spend significant sums of money on solutions that provide little or no increase in safety for the Big Rock Point Plant.

The PRA study objectives were:

1. Perform a comprehensive and systematic evaluation of plant safety.
2. Maintain technical objectivity in this effort.
3. Explore means of reducing plant risk.
4. Evaluate effectiveness of regulatory issues using PRA.
5. Develop a cost effective risk management program for Big

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icates that there are some
be taken to reduce risk. These
duce the frequency of core damage
year) by a factor of 15 to 20.