

Central files



**Consumers
Power
Company**

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General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

August 31, 1979

Mr James G Keppler
Office of Inspection and Enforcement
Region III
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-255 - LICENSE DPR-20 -
PALISADES PLANT - IE BULLETIN 79-06C
(NUCLEAR INCIDENT AT TMI - SUPPLEMENT)

Reference (1) Letter from GELiebler (Florida Power & Light) to VStello (NRC)
dated August 29, 1979

Consumers Power Company appreciates the extension granted by Mr D Boyd of your office (telephone conversation GSCashell to DBoyd on August 28, 1979) for submittal of our response to short-term items #2 and #3 and long-term item #1 of IE Bulletin 79-06C.

Reference (1) forwarded the completed document, CEN-115-P, which addresses short term action items 2 and 3 of IE Bulletin 79-06C. This document is applicable to Palisades, and therefore, constitutes a response to items 2 and 3. Also addressed in reference (1) is long-term action item 1. Consumers Power Company concurs with the conclusion of reference (1), that it is premature to propose a design for automatic tripping of reactor coolant pumps.

Short term action item 4 of IE Bulletin 79-06C requests that the guidelines developed under action item 3 be implemented in plant emergency procedures within 45 days of receipt of the bulletin. We consider it premature to implement said guidelines because they differ from the interim measures required by item 1 of the bulletin, and because they have not been accepted by the NRC staff.

We conclude that it is a mistake to needlessly confuse the plant operations personnel with revised procedures which may not be final. The interim measures are known to be more conservative than the proposed new guidelines, although more

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restrictive from an operations point of view. Therefore, the interim measures will be used until the new guidelines have been reviewed and approved by the NRC staff.

David P Hoffman (Signed)

David P Hoffman
Assistant Nuclear Licensing Administrator

CC: Director, Office of Nuclear Reactor Regulation
Director, Office of Inspection and Enforcement