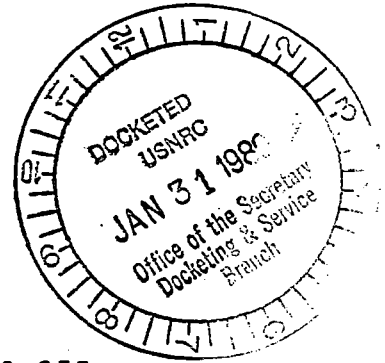


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE



In the Matter of)
)
CONSUMERS POWER COMPANY) Docket No. 50-255
) License No. DPR-20
(Palisades Nuclear Power Facility))

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters his appearance on behalf of Licensee, Consumers Power Company, 212 West Michigan Avenue, Jackson, Michigan 49201, in the above-captioned proceeding. In accordance with 10 CFR §2.713, the following information is provided:

Name: Alan P. Bielawski
Address: Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603
Telephone Number: (312) 558-7445
Admissions: Supreme Court of Illinois
United States District Court for
the Northern District of Illinois


Alan P. Bielawski

ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312) 558-7500

DATED: January 24, 1980

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

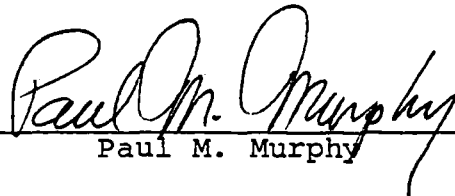
BEFORE THE ADMINISTRATIVE LAW JUDGE

In the Matter of)	
)	Docket No. 50-255
CONSUMERS POWER COMPANY)	License No. DPR-20
(Palisades Nuclear Power Facility))	

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters his appearance on behalf of Licensee, Consumers Power Company, 212 West Michigan Avenue, Jackson, Michigan 49201, in the above-captioned proceeding. In accordance with 10 CFR §2.713, the following information is provided:

Name:	Paul M. Murphy
Address:	Isham, Lincoln & Beale One First National Plaza Suite 4200 Chicago, Illinois 60603
Telephone Number:	(312)558-7537
Admissions:	Supreme Court of Illinois Supreme Court of Wisconsin United States Court of Appeals (7th Circuit and 10th Circuit) United States District Court for the Northern District of Illinois United States District Court for the Western District of Wisconsin


Paul M. Murphy

ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312)558-7500

DATED: January 24, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

In the Matter of)
) Docket No. 50-255
CONSUMERS POWER COMPANY) License No. DPR-20
(Palisades Nuclear Power Facility))

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters his appearance on behalf of Licensee, Consumers Power Company, 212 West Michigan Avenue, Jackson, Michigan 49201, in the above-captioned proceeding. In accordance with 10 CFR §2.713, the following information is provided:

Name: Michael I. Miller

Address: Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603

Telephone Number: (312)558-7417

Admissions: Supreme Court of Illinois
United States Court of Appeals
(7th Circuit and District
of Columbia Circuit)
United States District Court for
the Northern District of Illinois
United States District Court for
the District of Columbia



Michael I. Miller

ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312)558-7500

DATED: January 24, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

In the Matter of)
) Docket No. 50-255
CONSUMERS POWER COMPANY) License No. DPR-20
(Palisades Nuclear Power Facility))

DESIGNATION OF PERSONS UPON WHOM
SERVICE SHALL BE MADE

Consumers Power Company, pursuant to 10 CFR
§2.708(e) and §2.712(b), designates the following persons
to be served on its behalf with copies of all papers to be
filed in the above-captioned proceeding:

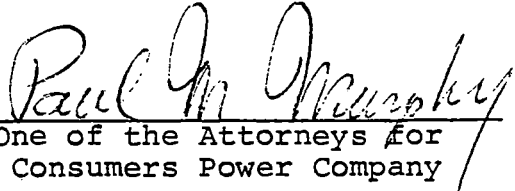
Judd L. Bacon, Esq.
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Michael I. Miller, Esq.
Isham, Lincoln & Beale
One First National Plaza
Suite 4200
Chicago, Illinois 60603

Paul M. Murphy, Esq.
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Suite 4200
Chicago, Illinois 60603

Alan P. Bielawski, Esq.
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One First National Plaza
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Chicago, Illinois 60603

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One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312) 558-7500


One of the Attorneys for
Consumers Power Company

DATED: January 24, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

In the Matter of)	
)	Docket No. 50-255
CONSUMERS POWER COMPANY)	License No. DPR-20
(Palisades Nuclear Power Facility))	

ANSWER OF NOTICE OF HEARING

Pursuant to 10 CFR §2.705, Consumers Power Company ("Licensee") answers the Notice of Hearing, dated January 17, 1980, as follows:

1. Licensee's position with respect to issue (a) is as follows:
 - (a) Licensee states that it has no knowledge or information sufficient to form a belief as to whether Licensee committed the violation of the technical specifications of License No. DPR-20, as set forth in Item 1 of the Notice of Violation issued to Licensee on November 9, 1979, and further states that even if such violation of technical specifications occurred, the item of non-compliance has been miscategorized as a "violation."
 - (b) Licensee admits the allegations of fact in Item 2 of said Notice of Violation, but states that the item of non-compliance has been miscategorized as a "violation."
 - (c) Licensee admits that the signoffs were not completed as alleged in Item 3 of said Notice of

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Violation, but has no knowledge or information sufficient to form a belief as to whether notification was completed.


Licensee's position with respect to issue (b) is that the December 20, 1979 Order Imposing Civil Penalties should not be sustained for the following reasons:

- (d) Licensee states that the proposed penalties are unwarranted by the facts and that the decision to propose such penalties was arbitrary, capricious, an abuse of discretion and otherwise not in accordance with the law and was influenced by considerations unrelated to the purpose of Section 234 of the Atomic Energy Act (42 USC §2282).
- (e) Licensee states that even if all items of non-compliance occurred as alleged in the Notice of Violation, the penalties proposed exceed the maximum penalty permitted by Section 234 of the Atomic Energy Act (42 USC §2282).

- 2. The items of the specification of issues controverted by Licensee are set forth in paragraph 1, above.
- 3. Licensee will appear by counsel and present evidence.

DATED: January 29, 1980

Respectfully submitted,



Michael I. Miller
Attorney for Licensee

ISHAM, LINCOLN & BEALE
One First National Plaza
Suite 4200
Chicago, Illinois 60603
(312) 558-7500