

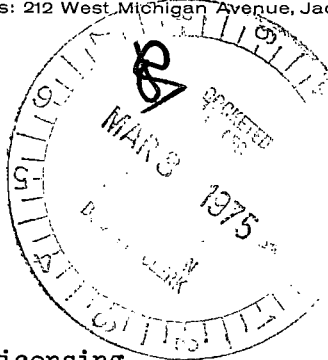
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**Consumers
Power
Company**

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

March 3, 1975



Mr. Angelo Giambusso
Director
Division of Reactor Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket 50-255
License DPR-20
Palisades Plant
ATWS

Dear Mr. Giambusso:

In accordance with our letter dated October 1, 1974 we are submitting our report "Palisades Plant Reactor Protection System Common Mode Failure Analysis." This report, numbered NUS-1342, will be provided under separate cover from the NUS Corporation.

After review of this report, Consumers Power Company has concluded that the design of the Palisades Plant Reactor Protection System is not particularly susceptible to common mode failures and that our operating and maintenance practices are such as to maintain a high degree of reliability.

Our letter of November 1, 1974 stated that a continuing study had determined that a number of single failures could occur which would cause a complete loss of feed-water flow. The reactor vendor (Combustion Engineering) has advised us that they are working diligently with members of the Regulatory staff to develop approved methods for the conduct of an analysis of this type of occurrence. We are unable at the present time to determine when this analysis will be completed and therefore request an extension of the submittal date for that part of the analysis. We will forward the analysis as soon as possible following its completion.

Yours very truly,

Ralph B. Sewell
Nuclear Licensing
Administrator

RBS/smm

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