

Consumers Energy

DS09

M. Chiramel
J. Shapaker

1-29-98
63 FR 4498
9

A CMS Energy Company

Palisades Nuclear Plant
2776 Jue Star Memorial Highway
Covert, MI 49043

Tel: 616 764 2296
Fax: 616 764 2425

Thomas J. Palmisano
Site Vice President

RECEIVED
1998 FEB 27 AM 8:37
RULES & DIR. BRANCH
US NRC

Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Mail Stop T6-D69
Washington, DC 20555-0001

COMMENTS - PROPOSED GENERIC COMMUNICATION; YEAR 2000 READINESS OF COMPUTER SYSTEMS AT NUCLEAR POWER PLANTS (MA0138)
[DOCID:fr29ja98-141]

In the Federal Register dated January 29, 1998, (Volume 63, Number 19), a notice of opportunity for public comment entitled, "Proposed Generic Communication; Year 2000 Readiness of Computer Systems at Nuclear Power Plants (MA0138)" was published.

Consumers Energy has completed a review of that proposed generic letter, "Generic Letter No. 98-XX: Year 2000 Readiness of Computer Systems at Nuclear Power Plants," and has the following comments:

Consumers Energy is willing to participate in a voluntary submission of project and schedule information to the NRC either via NEI or individually. Consumers Energy does not believe that a generic letter is warranted nor do we believe that the requested information should be required under 10 CFR 50.54(f). Because of the potential impact on safe plant operation and the potential financial impact, significant resources have been and will continue to be dedicated to resolve the year 2000 (Y2K) computer issue prior to the end of 1999 whether or not a formal requirement exists in the form of a generic letter.

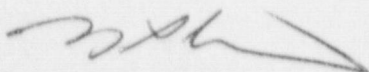
10
C-25

9803040382 980129
PDR I&E
MISC PDR



In the event a voluntary submittal is unacceptable to the NRC, we request that the date for attesting to Year 2000 readiness be changed from July 1, 1999, as described in the proposed generic letter, to October 1, 1999, to allow adequate time to accomplish the required actions.

Consumers Energy is actively pursuing Y2K readiness under an established Y2K readiness program. The Y2K readiness program for Palisades and Big Rock Point is consistent with NEI 97-01 guideline, "Nuclear Utility Year 2000 Readiness."



Thomas J. Palmisano
Site Vice President