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3/31/78



To: Director of Regulations
Nuclear Regulatory Commission
1717 H St. NE
Washington, DC 20555

The Nuclear Regulatory Commission has approved in principle the deletion of two tests in restarting the Palisades Nuclear Generating Plant. I believe this would be a serious mistake.

It has been reported that deleting the two tests would allow Palisades to begin operating two days earlier. This would save coal and possibly prevent the imposition of blackouts. It would also save about \$800,000 in generating costs. The benefits do not justify the risks. The tests have been required for good reasons, including public safety. Palisades has had many problems with its cooling system, so the test that was instituted to prevent recurrence of these problems should certainly not be permitted to be eliminated. Safe and efficient operation of a reactor requires that the position of the control rods be known, so it makes no sense to allow Consumers Power Company to test only seven of forty-six gauges which inform the reactor operator of the rod positions.

I would strongly prefer to pay more for electricity, or to have to do without electricity during blackout periods, if that is the price I must pay to be sure that the safety procedures developed for nuclear power plants will not be weakened whenever it is expedient. I am not opposed to nuclear power per se, but I am strongly opposed to the irresponsible administration of the nuclear power industry. NRC's approval of the deletion of these two tests has considerably weakened its credibility in this part of Michigan. I urge that you reverse this decision.

Sincerely,

Constance H. Ferguson

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Acknowledged by card 3/31

Office of the Secretary of the Commission

Docket No.s(s) 50-255

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