

M. I. LEWIS
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Charles M. Trammel , III

Office NRR

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Dear Sir;

Something about 10CFR 50.54 (x) and (y) trouble me greatly.

These paragraphs seem to be an attack upon the single failure criterion. This problem is even discussed on Page 15 of the Notice of "final rule."

I would very much appreciate a further airing.

Since "the rule assumes that special circumstances have occurred", doesn't that make those categories of special circumstances litigable.

For instance 2 safety grade solenoids failed at Limerick. Doesn't that make the issue of common mode failure of all solenoids litigable?

I would appreciate a speedy reply to this most immediate concern.

Very truly yours,

M. I. Lewis
5/26/83

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