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US NRC

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May 15, 2000

Rules and Directives Branch
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Draft Regulatory Guide, DG-1075, "Emergency Planning And Preparedness for Nuclear Power Reactors"
(Proposed Revision 4 to Regulatory Guide 1.101)
65 Fed. Reg. 15397 (March 22, 2000)
Request for Comments

Dear Sir:

Duke Energy Corporation endorses draft Regulatory Guide 1075, "Emergency Planning and Preparedness for Nuclear Power Reactors" (Proposed Revision 4 to Regulatory Guide 1.101) recognizing "Methodology for Development of Emergency Action Levels," NEI 99-01, Revision 4, February 2000 as alternative approach to NUREG 0654/FEMA REP 1 Revision 1 Appendix A, "Basis for Emergency Action Levels for Nuclear Facilities."

Revision 4 (NEI 99-01) enhances Regulatory Guide 1.101 Revision 3, August 1992, by incorporating industry and NRC lessons learned since implementation, consolidating the system malfunction initiating conditions and example emergency action levels which address conditions that may be postulated to occur at nuclear power plants during plant shutdown conditions. Also included are initiating conditions and example emergency action levels that fully address conditions that may be postulated to occur at permanently Defueled Stations and Independent Spent Fuel Storage Installations.

Recognition Category C, D, and E initiating conditions and associated emergency action levels were written so that they could be implemented by both NUMARC/NESP-007 and NUREG-0654/FEMA-REP-1 users. In this regard we concur that industry implementation of NEI 99-01 Revision 4 should be on a voluntary basis.

Template: ADM-013

E-RUDS = ADM-03
~~Add J. Birmingham~~
ADD: RANDY SULLIVAN (JLBA)

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If you have any questions, please contact Tina Kuhr at (704) 382-3151 (e-mail tmkuhr@duke-energy.com).

Sincerely,

M. S. Tuckman

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