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(65FR 42305)

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Nuclear Management Company, LLC
700 First Street
Hudson, Wis. 54016

September 28, 2000

Ms. Annette Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: NRC Request for Public Comments on the Union of Concerned Scientists Petition of Rulemaking
(65FR42305, July 10, 2000)

Dear Ms. Vietti-Cook

Nuclear Management Company, LLC¹ submits the following comments on the Union of Concerned Scientists Petition for Rulemaking that was published in the July 10, 2000, *Federal Register*.

The Union of Concerned Scientists reviewed the Hatch Nuclear Plant license renewal application and alleged in a 10 CFR 2.206 petition filed on May 13, 2000, that the liquid and gaseous radwaste systems are being operated outside their licensing and design bases. The petition documents two contentions and requests the Commission to amend the regulations contained in 10 CFR Part 51 and Part 54.

Nuclear Management Company, LLC has reviewed and concurs with the comments of the Nuclear Energy Institute submitted to your office in a letter dated September 22, 2000.

In summary, we believe the NRC should deny the request to amend the license renewal regulations. The design and licensing basis of the liquid and gaseous radwaste systems are sufficiently conservative such that the required analyses demonstrate that the assumed catastrophic failure of components in the systems will result in doses substantially below 10 CFR Part 100 guidelines and consistent with 10 CFR Part 20 guidelines. In other words, the radiological inventory in these systems is controlled and limited, and a postulated event or malfunction will not adversely impact public health or safety. Thus, there is no safety benefit to including these systems within the scope of license renewal for either aging management reviews (Part 54) or environmental impacts (Part 51).

If there are any questions on our comments please contact Terry Pickens at 715.377.3390 or by e-mail at tapickens@NMCCO.com.

Sincerely,

Douglas Johnson
Director, Regulatory Services and Strategic Issues

¹ Nuclear Management Company, LLC holds the operating licenses for the Duane Arnold Energy Center, Kewaunee, Monticello, Point Beach and Prairie Island plants.

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