



**DOCKET NUMBER
PROPOSED RULE PR 50
(67FR 66578)**

DOCKETED
USNRC

January 22, 2003 (3:54PM)

OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

GL02-069

January 7, 2003

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTN: Rulemakings and Adjudications Staff

**COMMENTS ON A PROPOSED AMENDMENT FOR VOLUNTARY FIRE
PROTECTION REQUIREMENTS FOR LIGHT WATER REACTORS;
ADOPTION OF NFPA 805 AS A RISK-INFORMED, PERFORMANCED-BASED
ALTERNATIVE**

Dear Ms. Vietti-Cook,

Virginia Electric and Power Company (Dominion) and Dominion Nuclear Connecticut (Dominion) appreciate the opportunity to comment on the subject proposed amendment to 10 CFR Part 50 as published in the Federal Register, volume 67, number 212, page 66578 on November 1, 2002.

Dominion would like to respond to two specific questions asked by the NRC in the Federal Register notification. These questions were asked in Section VI, "Additional Issue for Public Comment," of the notification.

Question (1): Is there any likelihood that licensees who are approved to use NFPA 805 would later decide that they would like to comply with paragraph (b) and the licensing basis that existed immediately prior to approval of NFPA 805?

Response: No, since to adopt NFPA 805, a licensee is required to perform additional analysis beyond that currently documented by the licensee. Also, the adoption of NFPA 805 would imply a licensee couldn't meet the requirements of paragraph (b) and chose to adopt NFPA 805 as a means to satisfy a regulatory requirement.

Template = SECY-067

SECY-02

Question (2): Do you agree that a license amendment would be required to revert to compliance with Section 50.48(b), and if not, why not?

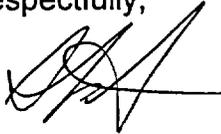
Response: Yes.

If you have any questions, please contact

Mr. Tom Carlisle thomas_carlisle@dom.com, or (804) 273-2211, or,

Mr. Don Olson don_olson@dom.com, or (804) 273-2830

Respectfully,

A handwritten signature in black ink, appearing to be 'S. Sarver', written over a horizontal line.

Stephen P. Sarver, Director
Nuclear Licensing & Operations Support