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Subject: Solicitation of Public Comments on the Fourth Year of Implementation of the Reactor Oversight Process (68 FR 64374)

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Attached are the comments of Nuclear Management Company, LLC regarding the fourth year of Implementation of the ROP.

<<ROP Fourth Year Comments 121903.pdf>>

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11/13/03
68 FR 64374
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Template - ADM-013

E-RIDS = ADM-03
Call - M. Moley (HSH)
R. Frahm (RFK)

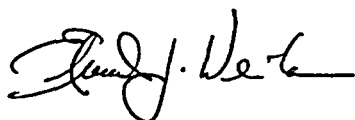
December 19, 2003

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Washington, DC 20555-0001

Solicitation of Public Comments on the Fourth Year of Implementation of the Reactor Oversight Process (68 Federal Register 64374, November 5, 2003)

Nuclear Management Company (NMC), LLC* appreciates the opportunity to comment on the fourth year of implementation of the Reactor Oversight Process.

The Reactor Oversight Process (ROP) constitutes a significant improvement over the previous enforcement paradigm and generally delivers consistent results based on objective risk-informed guidance. It also offers the means for increased public confidence by providing data not previously available to the public in a clear and well documented manner. NMC shares the views expressed by the Nuclear Energy Institute (NEI) in their comments dated December 18, 2003 and looks forward to the planned and future improvements in the process. NMC endorses the major themes raised in the NEI comments and encourages NRC to continue to pursue those changes that would further increase objectivity and lend themselves to the efficient allocation of NRC resources.



Edward J. Weinkam
Director, Regulatory Services
Nuclear Management Company, LLC

* NMC is the licensed operator of the Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant Units 1 and 2, and Prairie Island Nuclear Generating Plant Units 1 and 2.