

From: "Burnett, Debra J." <DJBURNET@southernco.com>  
To: <NRCREP@nrc.gov>  
Date: Thu, Mar 18, 2004 3:19 PM  
Subject: Southern Nuclear comments on SCWE best practices

2/12/04

69 FR 7025

<<Safety Conscious Work Env march 04.DOC>> <<Scan001.PDF>>

5

CC: <cmd@nei.org>

RECEIVED

2PM MAR 19 AM 10:16

Rules and Directives

Branch  
USNRC

FRIDS=ADM-03

Call=L. Jarrick (HJ)

Template=ADM-013

**J. Bernie Beasley, Jr., P.E.**  
Executive Vice President

**Southern Nuclear  
Operating Company, Inc.**  
40 Inverness Center Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201

Tel 205.992.7110  
Fax 205.992.6165



March 17, 2004

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

Re: Nuclear Energy Institute's Comments on *Best Practices to Establish and Maintain a Safety Conscious Work Environment* (69 Fed. Reg. 29,7025, February 12, 2004)

Chief, Rules and Directives Branch:

Southern Nuclear Operating Company ("SNC") concurs with the above-referenced comments submitted by the Nuclear Energy Institute (NEI)<sup>1</sup> on behalf of the nuclear energy industry in response to the Commission's February 12, 2004, Federal Register Notice. SNC agrees with the views expressed by NEI and urges the Commission to reconsider its decision to issue the subject document.

Like NEI, SNC clearly recognizes that safe, reliable and efficient nuclear generation depends on an environment in which workers can freely identify and communicate safety concerns to management. As noted by NEI's comments, however, we do not believe the best method of achieving this objective is through an agency-developed best practices document.

As an alternative, NEI has committed to the NRC to make available to the industry and to the public a "tool box" that will include an up-to-date variety of good practices and ways in which the NRC and other regulatory requirements may be met. This tool box will assist all Commission licensees, whether commercial reactor licensees or others, with maintaining strong safety conscious work environments. SNC supports NEI's efforts in this regard, and has pledged to share its experiences with NEI for inclusion in the tool box.

---

Chief Rules and Directives Branch

March 17, 2004

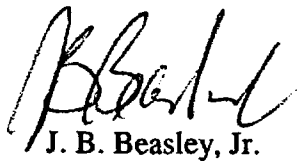
Page 2

SNC urges the Commission to give serious consideration to NEI's comments, and to accept NEI's offer to commit its time and resources to assist the Commission in promoting a safety conscious work environment. Again, SNC realizes the importance of maintaining an environment in which workers feel free to raise safety concerns, and commends the Commission's efforts in this area. SNC believes, however, the most effective and efficient mechanism to keep the industry informed of the latest information is through NEI.

For the reasons noted above, and those submitted in the NEI comments, SNC respectfully requests that the NRC not go forward with issuing the proposed best practices guidance.

If you have any questions concerning SNC's position or would like to discuss these comments further, please feel free to contact me at (205) 992-7110.

Sincerely,



J. B. Beasley, Jr.

JBB/JOM:djb

xc: Mr. Charles M. Dugger