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Chief, Rules and Directives Branch
Mail Stop TG-D59
Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on Draft Supplement to "Standard Review Plan on Power Reactor Licensee Financial Qualifications and Decommissioning Funding Assurance," NUREG-1577, Rev. 1 (69 FR 43278)

Ladies and Gentlemen:

Progress Energy, Inc. (PGI) supports the development of criteria by which the NRC would evaluate the use of an insurance policy to provide decommissioning funding assurance under 10 CFR 50.75. However, the discussion of Issuer Qualifications in Section II.4 of the draft Supplement to the Standard Review Plan, NUREG-1577, Revision 1, raises two concerns:

- 1) The requirement that the insurer be licensed by the authorities of the State where the relevant nuclear plant is located to transact the business of insurance would seem impractical when extended to cover all states with nuclear power plants.
- 2) The discussion of "captive" or "mutual" insurer could be interpreted to prevent some otherwise qualified large insurers that are organized mutuals from developing a program.

Please contact me at (919) 546-4579 if you have any questions.

Sincerely,

Signature for T. Groblewski

Tony Groblewski
Supervisor - Regulatory Affairs

HAS

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add = M. DUSANOWSKI (MADI)

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