



Progress Energy

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March 28, 2005

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Attention: Rulemakings and Adjudication Staff
Secretary
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Comments on the Proposed Rule on Protection of Safeguards Information (70 FR 7196)

Ladies and Gentlemen:

Carolina Power & Light Company, now doing business as Progress Energy Carolinas, Inc. (PEC), and Florida Power Corporation, now doing business as Progress Energy Florida, Inc. (PEF), provide these comments on the proposed amendment to the regulations for the protection of Safeguards Information (SGI) which the NRC published in the Federal Register (70 FR 7196) on February 11, 2005.

PEC and PEF support efforts to protect sensitive information about nuclear facilities and are working with the Nuclear Energy Institute (NEI) to promote efficient and effective controls. To that end, PEC and PEF have reviewed and endorse the comments submitted by NEI on this proposed rule.

PEC and PEF are particularly concerned about the inclusion of "... detailed control and accounting procedures for special nuclear material ..." in the 10 CFR 73.2 definition of SGI. Without some additional clarification, this definition could create an unnecessary burden on plant operations and support, with little or no corresponding benefit to security. For example, would this definition include the written directions for transferring fuel between the fuel pool and the reactor, or the outage schedule that shows when fuel movement occurs, or the real-time communication channels or video monitoring/recording to support the fuel movement, or the computer and software that performs the isotopic calculations for irradiated fuel? Restricting access to these types of detailed information would significantly hamper work coordination and communication within the protected area, without affecting what is commonly known outside the protected area in a more general sense.

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

Sincerely,

Tony Groblewski
Supervisor - Regulatory Affairs

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