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DOCKETED
USNRC

June 6, 2006 (3:30pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

16

PR 1,2,10,19,20,21,25,26,50,51,52,54,55, et. al.
(71FR12781)

May 30, 2006



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AR-06-1181

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Southern Nuclear Operating Company
Comments on Notice of Proposed Rulemaking for 10 CFR 52,
"Licenses, Certifications, and Approvals for Nuclear Power Plants"

Dear Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC), the licensed operator for the Joseph M. Farley Nuclear Plant, the Edwin I. Hatch Nuclear Plant and the Vogtle Electric Generating Plant, has reviewed the notice of proposed rulemaking for 10 CFR Part 52 entitled "Licenses, Certifications, and Approvals for Nuclear Power Plants" published in the Federal Register on March 13, 2006 (71 Federal Register 12,782). Our review activities have been closely coordinated with the review efforts of other NuStart utilities and the Nuclear Energy Institute (NEI). On May 30, 2006, NEI submitted consolidated industry comments on the proposed rulemaking. SNC endorses the NEI letter with no additional comments.

SNC is actively pursuing an Early Site Permit and a Combined License under 10 CFR 52 for two additional units at the Vogtle site. The license applications for additional units at the Vogtle site represent a significant resource commitment for SNC and the NRC. SNC believes that the changes presented by NEI are necessary to make this licensing process more efficient and effective. As an example, NEI's recommendation that 10 CFR 52 should allow the original design certification applicant to obtain amendments to the design certification rule addresses a critical need within the licensing process. The capability to make standardized changes to the certified design will result in fewer exemption requests and improved standardization.

Sincerely,

J. A. (Buzz) Miller

TOM/CRP

Template = SECY-067

SECY-02

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cc: Southern Nuclear Operating Company
Mr. J. B. Beasley, Jr., President and CEO
Mr. J. T. Gasser, Executive Vice President, Nuclear Operations
Mr. H. L. Sumner, Jr., Vice President, Plant Hatch
Mr. D. E. Grissette, Vice President, Plant Vogtle
Mr. M. L. Stinson, Vice President, Plant Farley
Document Services RTYPE: AR01

Georgia Power Company
Mr. O. C. Harper IV, Resource Planning and Nuclear Development Vice President