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63 FR 9581
Feb 25, 1998

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James Knubel
Senior Vice President and
Chief Nuclear Officer

March 27, 1998
JPN-98-010
IPN-98-037

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RULES & DIR. BRANCH
US NRC

Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Mail Stop T6-D69
Washington, DC 20555-0001

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
**COMMENTS ON PROPOSED GENERIC COMMUNICATION;
LABORATORY TESTING OF
NUCLEAR-GRADE ACTIVATED CHARCOAL (M97978)**

REFERENCES: See below

Dear Sir:

The Authority has reviewed the proposed generic letter (Reference 1) published February 25, 1998. This draft generic letter (GL) alerts licensees to problems that may be associated with certain activated charcoal testing methods and asks licensees to take action to correct these problems on an accelerated timetable. The Authority has several comments and concerns regarding the regulatory aspects of this GL, which are detailed below.

In general, the Authority supports the comments submitted by the Nuclear Energy Institute (NEI) on this proposed GL. While the proposed GL appears to identify several concerns regarding past charcoal test techniques, other less burdensome methods to assure the continued health and safety of the public exist. These other methods should be examined before prescriptive remediations, like those detailed in the draft GL, are imposed. Clearly, the positions detailed in the draft GL are new and a full backfit analysis should be performed. In addition, the actions requested go well beyond those appropriate for a GL.

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PDR I&E
MISC PDR