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 MARCHI,M.L. Public Service Electric & Gas Co. of New Jersey
 RECIP.NAME RECIPIENT AFFILIATION
 MEYER,D.L. Rules & Directives Review Branch (Post 920323)

SUBJECT: Comment opposing draft NUREG-1633, "Assessment of use of Potassium Iodide (KI) as Protective Action During Severe Reactor Accidents." Agrees with NRC Staff assessment in SECY-98-061 & endorses Option 2.

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Wisconsin Public Service Corporation
(a subsidiary of WPS Resources Corporation)

1998 SEP 29 12:37
600 North Adams Street
P.O. Box 19002
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63 FR 38865
July 20, 1998

September 3, 1998

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Mr. David L. Meyer
Chief, Rules Review and Directives Branch
Mail Stop T-6 D69
Office of Administration
United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Mr. Meyer:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Draft NUREG-1633, "Assessment of the use of Potassium Iodide (KI) as a Protective Action During Severe Reactor Accidents," (63 Fed. Reg. 38865, July 20, 1998)
Request for Comments

Wisconsin Public Service Corporation, operator of the Kewaunee Nuclear Power Plant, wishes to submit the following comments in response to the subject notice. After reviewing the draft NUREG-1633, "Assessment of the Use of Potassium Iodide (KI) as a Protective Action During Severe Reactor Accidents," (63 Fed. Reg. 38865, July 20, 1998), we find no basis that stockpiling or predistribution of KI as a protective action adds any significant benefit to the public health and safety. Wisconsin Public Service agrees with the NRC staff's assessment in SECY-98-061, "Staff Options for Resolving a Petition for Rulemaking Relating to Reevaluation of the Policy Regarding the Use of Potassium Iodide (KI) by the General Public After a Severe Accident at a Nuclear Power Plant," and we endorse Option 2. This option recommends denying the petition and supports the FRPPC policy statement discussed in COMSECY 97-028 which maintains that evacuation and sheltering are the primary protective actions.

Wisconsin Public Service strongly urges the NRC to reconsider its approval of the proposed rulemaking petition.

Sincerely,

Mark L. Marchi
Site Vice President-Kewaunee Plant

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cc - US NRC Document Control Desk
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US NRC Senior Resident Inspector

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