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AUTH.NAME AUTHOR AFFILIATION  
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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600 North Adams Street  
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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 redistribution 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

RPP  
cc - US NRC Document Control Desk  
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