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SUBJECT: Comment supporting proposed generic communication 10CFR50.54
 re process for changes to security plans w/o prior NRC
 approval.

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Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RULES REVIEW & DIR. DR.
USNRC

Subject: *Proposed Generic Communication; 10 CFR 50.54 (p) Process for Changes to Security Plans Without Prior NRC Approval*
(60 FR 31326, dated June 14, 1995)
Notice of Opportunity for Public Comment

On June 14, 1995, the Nuclear Regulatory Commission published for public comment, "Proposed Generic Communication; 10 CFR 50.54 (p) Process for Changes to Security Plans Without Prior NRC Approval." The issuance of the proposed generic letter would clarify the process for changes to security plans under the provisions of 10 CFR 50.54 (p) by providing a screening criterion that would ensure consistency of security plan changes without prior NRC approval. These comments are submitted on behalf of Florida Power & Light (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

The Nuclear Energy Institute (NEI) is providing comments on the proposed generic letter (GL) on behalf of the industry. FPL endorses the NEI comments.

NEI notes in its response that there are several examples listed in the GL as unacceptable (i.e., changes that have been proposed or submitted but were determined to decrease the effectiveness of Security plans) that NEI believes can fall under the acceptable category with some minor modifications. NEI goes on to state that further comments on specific examples will be conveyed to the NRC independent of their comment letter at a later date, with the intention that this GL should be published in final form as soon as possible. FPL supports this position, however, emphasizes the need to ensure continued communication on both acceptable and unacceptable examples. Once examples are provided in the GL, utilities will tend to accept these examples as final. This could create a perception by licensees that an opportunity does not exist to pursue additional supporting information for commitment change examples (current and future) that can be made under 50.54 (p). The industry and the NRC must ensure that every aspect has been considered in achieving optimum efficiency of licensee security plans.

FPL commends the NRC for its ongoing efforts to provide improved processes supporting continued relief from unduly burdensome or inefficient regulation. We appreciate the opportunity to comment on the proposed GL.

Very truly yours,

W. H. Bohlke
for W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

an FPL Group company

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