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Docket File
50-320

MIDDLE SOUTH UTILITIES, INC./BOX 61005/NEW ORLEANS, LA 70161/(504) 529-5262

FLOYD W. LEWIS
CHAIRMAN/CHIEF EXECUTIVE

August 1, 1979

Dr. Harold R. Denton
Director, Office of Nuclear
Reactor Regulations
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

REGULATORY DOCKET FILE COPY

Dear Dr. Denton:

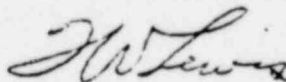
In connection with your review of the lessons learned from TMI-2, I would like to address the problem of limiting conditions for operation of nuclear power plants based upon safety system availability.

The utility industry shares your concern that this is an important problem that must be continuously improved. However, we do not believe that either safety or public interest is enhanced by an arbitrary shutdown procedure in the event of human error or procedural inadequacies. Instead, we believe that there are some new and creative approaches to this issue that can achieve this goal while permitting the utilities to provide essential power to the public.

On behalf of the TMI Ad Hoc Nuclear Oversight Committee, we commit to providing you a program by September 1, 1979, that would be designed to meet the stated objective of operating reliability while, at the same time, permitting provision of power to the public generally. In this connection, we will take a look at existing regulations, as well as Regulatory Guide 1.16 and other possible directives.

Since this matter is one of major significance to the ability of the utilities to serve the public and since there is agreement on safety goals, we hope that this letter will serve to permit you to receive our plan before taking further action. We would be most pleased to discuss this matter with you in the interim and to proceed as may be most helpful to you and your staff.

Sincerely yours,



Floyd W. Lewis, Chairman
Ad Hoc Nuclear Oversight Committee

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