TEXAS UTILITIES GENERATING COMPANY
2001 BRYAN TOWER · DALLAS, TEXAS 75201

R. J. GARY
EXECUTIVE VICE PRESIDENT
AND GENERAL MANAGER

November 30, 1979

Mr. Robert G. Ryan, Director
Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Final Report - Beyond Defense-in-Depth: Cost and Funding of State and Local Government Radiological Emergency Response Plans and Preparedness in Support of Commercial Nuclear Power Stations, NUREG-0553, October 1979

Dear Mr. Ryan:

We appreciate the opportunity to comment on the above report.

It is evident that the State of Texas and our local county agencies are experiencing costs in developing and implementing emergency preparedness plans to support the operation of Comanche Peak Steam Electric Station. We agree with NUREG 0553 that the costs for plans and preparedness should be ultimately paid by the consumer of electricity; however, we do not agree with the idea that the federal government should collect and redistribute it to the state and local authorities. Money has a way of being diluted when it goes to Washington to be returned to the ultimate user. Therefore, we feel that this way of funding is unsatisfactory. The utilities building nuclear plants should make arrangements with the states and local authorities for this financing.

Additionally, the flat rate of $1,000,000 proposed for each utility to fund emergency planning appears unfair. It seems obvious to us that emergency planning for a plant being built in a highly populated area will be more expensive than one being built in a rural and out-of-the-way area. Therefore, the two fees for these should not be the same.

Yours very truly,

R. J. Gary

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