

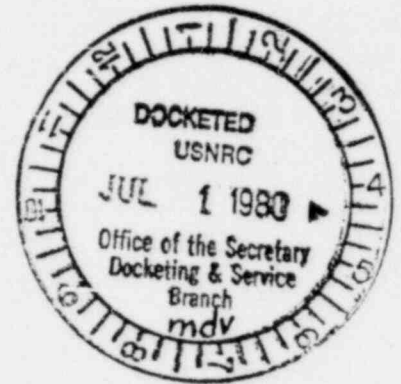
PP&L

TWO NORTH NINTH STREET, ALLENTOWN, PA. 18101

PHONE: (215) 821-5151

NORMAN W. CURTIS
Vice President-Engineering & Construction
821-5381

DOCKET NUMBER PR-50 (11)
PROPOSED RULE
(45 FR 36082)



June 27, 1980

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Sir:

Attached please find Pennsylvania Power and Light Company's comments on the Proposed Rule Change to 10 CFR 50 entitled, "Fire Protection Program for Nuclear Power Plants Operating Prior to January 1, 1979" (45FR36082). Hopefully, these comments will benefit the development of this document.

Very truly yours,

Norman W. Curtis
Vice President-Engineering & Construction

DJK/kes

Attachment

Acknowledged by card. L.O.C. 7/1/80

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Comments on Proposed Rule Change to 10 CFR 50

- o The proposed regulation is excessively specific, and does not allow latitude necessary to accommodate the specified requirement in operating or nearly constructed plants.
- o The proposed regulation does not allow for flexibility, or alternatives. The regulation should specify the desired requirement and fire protection program intent. The detailed methods of compliance should be removed and replaced as guidelines to allow alternate solutions.
- o The proposed regulation should be modified so that alternate solutions which meet the regulation's intent and have been accepted by the NRC staff will remain in effect and not be overruled by a specific solution or method of compliance stated in the proposed regulation.
- o The timetable for performing the required modifications is unrealistic. Certainly, proper fire protection is needed on a timely basis but design procurement and installation of these modifications will exceed the allotted time.