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Power Generation Department

May 7, 1980



DOCKET NUMBER  
PROPOSED RULE **PR-19 (20)**  
**(45 FR 19564)**

Mr. Samuel J. Chilk, Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

ATTENTION: Docketing and Service Branch



Gentlemen:

Georgia Power Company would like to take this opportunity to comment on the Notice of Rulemaking regarding Informal Conference During Inspection as published on March 26, 1980, at 45 Federal Register 19564. This proposed amendment to regulations (10 CFR Part 19) would establish a mechanism for holding informal conferences, at any time during or after an NRC inspection, to which both the NRC inspector and licensee management could invite individuals with legitimate interests.

We are very concerned about the intent of this proposed action as well as the specific language of the proposed regulation. While we recognize the current NRC practice for holding informal conferences, we are concerned that the new regulation could impel the Commission to invite inappropriate individuals who could potentially delay or obstruct the inspection process. We would hope that the final regulations will more specifically address such concerns.

With regard to the specific proposed regulation, we would like to point out that it does not include any provision for allowing the NRC to invite its consultants to the meetings, since such consultants do not constitute interested parties per se. Furthermore, we feel that it would be inappropriate to address that issue in the subject regulation since invitation of consultants does not involve the same considerations as inviting interested persons, and in general is not related to the 10 CFR Part 19 concerns with respect to workers.

The proposed regulations are unnecessarily vague and broad as to the parties whom may be invited to the meetings. Since the focus of Part 19 has to do with workers as defined in Section 19.3, it would be appropriate to limit the persons who may be invited by NRC to workers or their authorized representatives. Language expressing this limitation was included in the Supplementary Information and is repeated as follows:

Acknowledged by card. 5/13/80-mdv

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U. S. Nuclear Regulatory Commission  
May 8, 1980  
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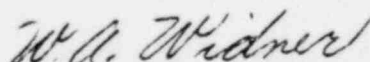
- (a) A representative of workers who has submitted a request for inspection under paragraph 19.16 of the regulations; or
- (b) A worker who has an expressed interest in the inspection which has been brought to the attention of the NRC according to subparagraph 19.15 or 19.16 of the regulations.

It is the feeling of Georgia Power Company that this language will be responsive to the requests which led to the proposed regulations while staying in the bounds of the purpose of Part 19. If, however, the NRC finds it necessary to provide for the invitation of a broader class of individuals, clarifying language should be added stating that the invited individuals shall demonstrate explicit and legitimate interests pertaining directly to the inspection at hand.

Finally, the proposed regulations do not specifically limit an invited individual to attendance at the meeting. Georgia Power Company feels that the regulations should specifically state that the NRC may only invite individuals to the informal conference, and in such case, the conference shall be held at a location provided for such purpose at licensee's designation.

Thank you for this opportunity to comment on this issue.

Sincerely yours,



W. A. Widner  
Vice President and General Manager  
Nuclear Generation

LTG/SCR/mb