



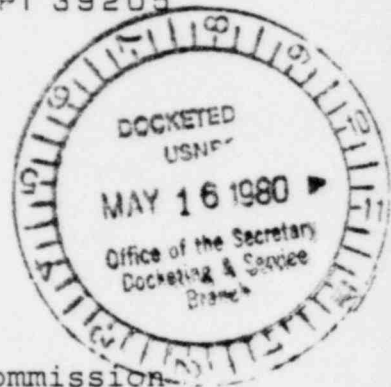
MISSISSIPPI POWER & LIGHT COMPANY

Helping Build Mississippi

P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

NORRIS L. STAMPLEY
VICE PRESIDENT

May 6, 1980



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

ATTENTION: Docketing and Service Branch

SUBJECT: Nuclear Regulatory Commission
Notice of Proposed Rulemaking:
Informal Conference During Inspection;
45 F.R. 19564, March 26, 1980
File: 0260/11800/L-800.0
AECM-80/92

DOCKET NUMBER PR-19 (34)
PROMISED RULE (45 FR 19564)

Gentlemen:

Mississippi Power & Light Company (MP&L), as agent for and co-licensee with Middle South Energy, Inc., is presently constructing the Grand Gulf Nuclear Station, Units No. 1 and No. 2, near Port Gibson, Mississippi, and is responsible to the Nuclear Regulatory Commission (NRC) for the licensing and future operation of the facility. With regard to the proposed amendment to Regulations, 10 CFR Part 19, promulgated by the NRC in the Federal Register on March 26, 1980, 45 F.R. 19564, MP&L submits the following comments:

(1) The published draft of the proposed rule contains certain ambiguities and is, therefore, subject to overbroad interpretation and application. Specifically, the proposed rule would give both the licensee and the NRC inspector the option of inviting to the informal inspection conference "individuals with legitimate interests in matters pertaining to the inspection" without adequately defining who has a "legitimate interest" within the meaning of the rule. Absent additional clarifying language, the rule is potentially overbroad in its scope and application and could be misinterpreted so as to include individuals who do not have specific interests in matters relating to the inspection. MP&L, therefore, proposes that the rule be revised so as to be in accordance with the supplementary information published with the proposed rule by providing that the NRC inspector and the licensee have the option of inviting "workers, worker representatives, contractors, expert consultants, or management representatives retained by the licensee or by the NRC and having a legitimate and specific expertise and interest directly relating to the subject matter of the inspection."

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Acknowledged by card 5/16/80 mdy...

MISSISSIPPI POWER & LIGHT COMPANY

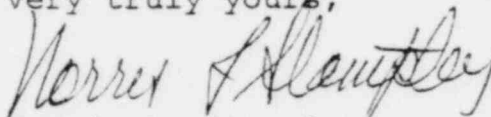
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(2) Since Section 19.14 (a) of the existing rule provides that "each licensee shall afford to the Commission at all reasonable times opportunity to inspect materials, activities, facilities, premises, and records . . . ," MP&L suggests that the scope of the access to the licensee's materials, records, etc. by the NRC invitees under the proposed rule also be clarified. MP&L proposes that the NRC invitees be afforded access to only those materials and records discussed in the entrance and exit meetings which do not contain confidential or proprietary information.

If you have any questions or would like any additional information with regard to these comments, please let us know.

Very truly yours,



Norris L. Stampley
Vice President

NLS/djp

cc: Mr. T. B. Conner
Mr. L. F. Dale
Mr. R. B. McGehee

Mr. Victor Stello, Jr., Director
Division of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555