

Carolina Power & Light Company

May 9, 1980

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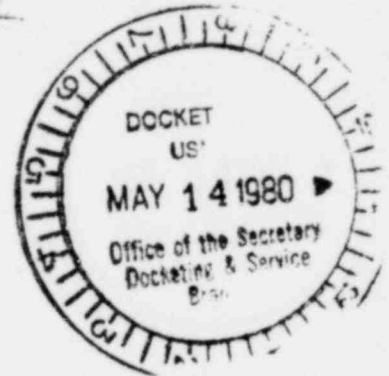
PROPOSED RULE

PR-19 (25)

(45 FR 19564)

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attention: Docketing and Service Branch

10CFR19
Information Conference During Inspection;
Notice of Proposed Rulemaking



Gentlemen:

In response to your request for comments (45 Fed. Reg. 19564, dated March 26, 1980) regarding proposed amendments to 10CFR19 to allow participation by interested parties in the meetings between NRC inspectors and the licensee, Carolina Power & Light Company submits the following:

We have reviewed the proposed rule and would take strong exception to its implementation. Including other parties as participants in informal inspection meetings between NRC inspectors and the licensee would tend to inhibit free exchange of information, could violate existing privacy rules regarding personnel and proprietary matters, and would tend to inhibit progress in resolving legitimate safety issues. NRC inspectors already provide interested parties unbiased audits and investigations of potential safety concerns which are raised by workers, unions, or general members of the public. In addition, the results of NRC inspections are well documented and issued for public review. We, therefore, see no additional benefit in allowing "interested parties" to participate in the established NRC inspection program. In our experience, lack of participation by interested parties has never inhibited NRC inspectors from resolving health and safety considerations expeditiously, as the proposed rule would imply.

Finally, were this proposed rule to be implemented, we see no means for NRC to restrict participants to those having "legitimate interests," since this ruling would be subject to lengthy challenge by any individual denied the opportunity to participate in these meetings. Therefore, it is our opinion that the proposed rule is unnecessary and should be withdrawn in its entirety.

Yours very truly,

M A McDuffie

M. A. McDuffie
Senior Vice President
Engineering & Construction

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Acknowledged by card. 5/14/80. mdv.