

CP&L

Carolina Power & Light Company

February 17, 1981

DOCKET NUMBER

PROPOSED RULE

PR-50

(2)

Codes + Stnds

(45 FR 86500)

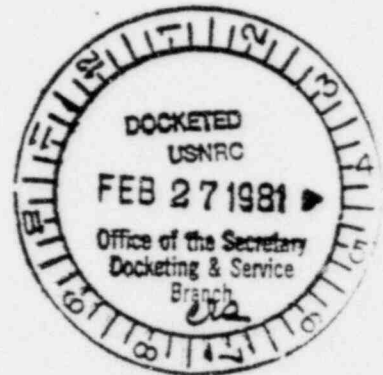
File: NG-3514(B)(R)

Serial No.: NO-81-301

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

ATTENTION: Docketing and Service Branch

COMMENTS ON PROPOSED RULE CONCERNING CODES AND
STANDARDS FOR NUCLEAR POWER PLANTS



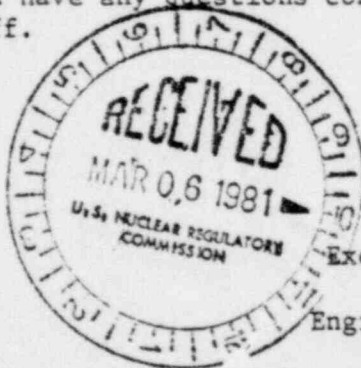
Dear Sir:

In response to the Federal Register notice of December 31, 1980, Carolina Power & Light Company (CP&L) submits the following comments on the NRC's proposed rule concerning Codes and Standards for Nuclear Power Plants. The proposed rule amends the Code of Federal Regulations, Title 10, Section 50.55a to incorporate by reference the Winter 1978 Addenda and Summer 1979 Addenda of Section III and Section XI of the ASME Boiler and Pressure Vessel Code. The change will impose a new Article IWF for inspection of component supports. Article IWF is somewhat incomplete and adoption of its requirements may cause further confusion in the development of Inservice Inspection (ISI) programs. Specifically, there are no acceptance criteria published in the Article against which to compare inspection results. Secondly, the Article does not establish criteria for exempting any support from examination. Until these items are resolved, no benefit is achieved by using the 1977 Edition and addenda through the Summer 1979 Addenda of the ASME Boiler and Pressure Vessel Code.

If you have any questions concerning these comments, please contact our staff.

Yours very truly,

E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction



JHE/jc (3545)

L-4-1/P