

**Florida
Power**
CORPORATION

December 30, 1980

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

Attention: Docketing and Service Branch

Subject: Electric Utilities' Petition on Anticipated Transients
Without Scram (ATWS), PRM-50-29

Dear Sir:

Florida Power Corporation endorses the Electric Utilities' Petition for Rulemaking on ATWS, PRM-50-29.

Since 1969, the government and industry have disagreed on the probability of an ATWS and what was required to prevent and/or mitigate an ATWS. Florida Power feels that the Electric Utilities' Petition for Rulemaking is a reasonable and effective resolution to the ATWS issue. It will provide enhanced prevention and mitigation of the extremely unlikely ATWS event, without excessive down time or danger of inadvertent actuation. Florida Power feels that this Petition for Rulemaking is superior to the NRC staff's proposal detailed in SECY-80-409 of September 4, 1980, and modified November 7, 1980. The NRC staff's proposal would involve extensive design and analysis, excessive outage time to install new equipment, increased likelihood of spurious reactor trips, and costs tens of millions dollars more than the Electric Utilities petition.

Florida Power feels that the government and industry can both support the Electric Utilities' Petition for Rulemaking on ATWS and resolve the ATWS issue with adequate protection.

Very truly yours,

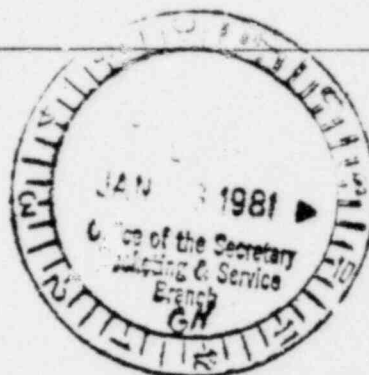
FLORIDA POWER CORPORATION

P. Y. Baynard

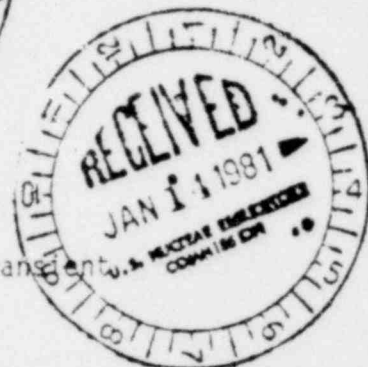
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Acknowledged by card... 1/8/81...

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