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DOCKET NUMBER

EXPANDED RULE

PR-50 (28)

April 13, 1981

(46 FR 18045)

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

Attention: Docketing and Service Branch

Re: Proposed Amendments to 10 CFR §50.34

Dear Secretary Chilk:

This letter is in response to your invitation to comment on the proposed amendment to 10 CFR §50.34 as set forth in the attachment to your March 18, 1981 letter.

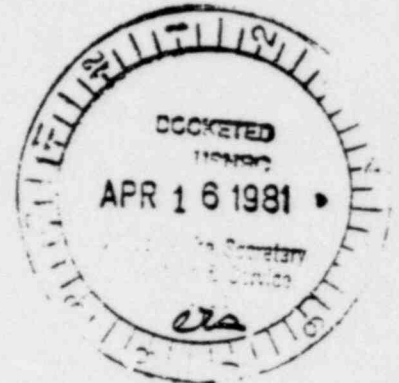
While we agree that the proposed amendment appears to be one which would add needed safety-related requirements to the Commission's regulations, we submit that the new rule, if enacted, should be made applicable to present holders of construction permits, as well as to applicants for construction permits and manufacturing licenses. To decline to so apply the amendment, especially to plants which are in the very early stages of construction, suggests that the Commission is not seriously attempting to implement the needed upgrading of safety for all nuclear plants.

We would appreciate your furnishing us with copies of all documents pertaining to this rulemaking proceeding and notify us of all developments and proceedings in connection with it.

Respectfully submitted,

Robert J. Vollen

Jane M. Whicher



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