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PROPOSED RULE  
**(54FR50610)**

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**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

DOCKETED  
USNRC

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**Ralph G. Bird**  
Senior Vice President — Nuclear

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BECO 90-021

February 6, 1990

Mr. Samuel J. Chilk  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

License DPR-35  
Docket 50-293

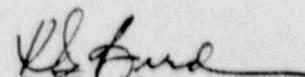
BOSTON EDISON COMPANY COMMENTS ON REVISIONS TO THE  
ENFORCEMENT POLICY OF 10CFR PART 2, APPENDIX C (54FR50610)

Reference: NUMARC Letter to Mr. S. J. Chilk, Secretary, USNRC, dated  
February 6, 1990

Dear Mr. Chilk:

Boston Edison Company (BECO) endorses the nuclear power industry comments and positions offered to the Nuclear Regulatory Commission (NRC) by the referenced Nuclear Management and Resources Council, Inc. (NUMARC) letter on revisions to the Enforcement Policy of 10CFR Part 2, Appendix C.

The revision adds an additional civil penalty adjustment factor for violations involving maintenance deficiencies. We urge the Commission to rescind this Enforcement Policy revision because maintenance issues should not be treated differently than other safety issues.

  
R. G. Bird

PMK/4067

cc: Mr. M. Fairtile, Project Manager  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation  
Mail Stop: 14D1  
U. S. Nuclear Regulatory Commission  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 02852

(cc: Continued on next page)

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Boston Edison Company  
February 6, 1990  
U. S. Nuclear Regulatory Commission

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U. S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Senior NRC Resident Inspector  
Pilgrim Nuclear Power Station

Mr. Warren Hall  
NUMARC  
1776 Eye Street N.W.  
Suite 300  
Washington, DC 20006-2496