

AMERICAN ELECTRIC POWER Service Corporation



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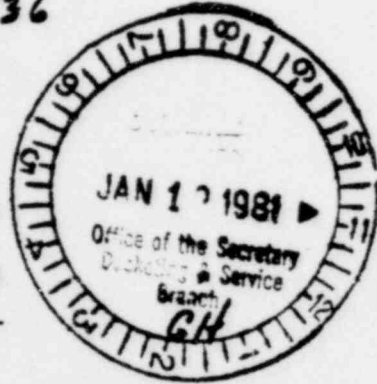
January 15, 1981

DOCKET NUMBER **PR 50**
PROPOSED RULE **45 FR 75536**

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

Attention: Docketing and Service Branch

Re: COMMENTS ON PROPOSED RULE CHANGE TO
10 CFR PART 50, APPENDIX G AND H



Dear Mr. Chilk:

In response to the proposed rule change to 10 CFR Part 50, Appendix G and H, Reactor Vessel Material Surveillance Program Requirements, the following comment is offered regarding Appendix H, Item III., Paragraph A, Report of Test Results.

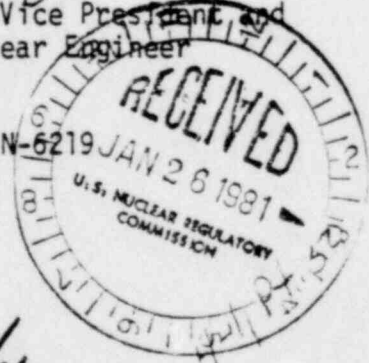
If the phrase "after completion of testing" means "after completion of the analysis of all data and the generation of new pressure-temperature limits," then ninety days is a workable submittal period. If this interpretation is not correct, then sufficient time must be allowed for data analysis, development of pressure-temperature limits, and utility review. Ninety days after development of new pressure-temperature limits would be a suitable submittal date.

Very truly yours,

R. W. Jurgensen
Assistant Vice President and
Chief Nuclear Engineer

RWJ:clb

- cc: S. J. Milioti/J. I. Castresana/G. M. Gurican/DC-N-6219
- S. H. Steinhart/R. C. Kopelow/J. R. Jensen
- D. V. Shaller - Bridgman
- T. R. Satyan-Sharma



Acknowledged by hand: *1/19/81*