

GENERAL ELECTRIC

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125

Mail Code 861

NUCLEAR FUEL

AND SERVICES

DIVISION

SPENT FUEL SERVICES OPERATION

DMD-566

DOCKET NUMBER

PROPOSED RULE

PR-30, 40, 70
(46 FR 29712) 11

August 3, 1981

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

ATTN: DOCKETING AND SERVICE BRANCH

Gentlemen:

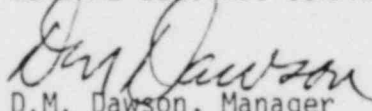
General Electric Spent Fuel Services Operation is pleased to comment on the advanced notice of proposed rulemaking related to upgraded emergency preparedness for certain fuel cycle and materials licensees (46 FR 29712).

Our Morris Operation spent fuel storage facility, is one of the "certain fuel cycle and materials licensees" that has been affected by the lack of suitable definition in Nuclear Regulatory Commission regulations of emergency preparedness programs for licensees other than production and utilization facilities. Morris Operation has been required to follow the guidance of 10CFR Part 50, Appendix E, Section IV for emergency planning. The magnitude of emergencies anticipated in Appendix E, Section IV do not realistically represent the benign operation and accident potential of spent fuel storage, therefore, preparing an emergency plan using Appendix E, Section IV as a guide has required a good deal of interpretive license to produce a useable document. The effort initiated by this ANSP is anticipated to be an improvement in the flexibility of regulations.

The comment of importance to us at this stage of development of the proposed rulemaking is that Part 72 is not listed among the parts affected. We assume that Part 72 facilities will be considered during the development of this rule and we wish to be kept informed of the progress of this rulemaking.

Respectfully,

GENERAL ELECTRIC COMPANY


D.M. Dawson, Manager

Licensing, Transportation and
Quality Assurance

/bn

8108130167 810803
PDR PR
30 46FR29712 PDR

H002
6/1/81

Add: Michael
Jangochian
5250 OH

Acknowledged by card. 8/11/s.l.m.d.v..

