



DOCKET NUMBER
PETITION RULE PRM 50-58
(58FR12339)

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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY
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THOMAS W. ORTCIGER
DIRECTOR

April 2, 1993

JIM EDGAR
GOVERNOR

(2)

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

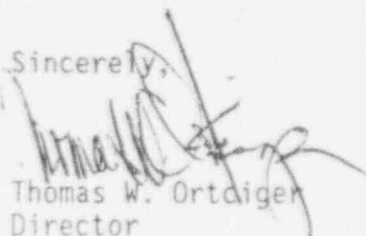
Dear Sir or Madam:

RE: Petition for Rulemaking on Frequency of Emergency Planning Exercises
(SP-93-033)

The Illinois Department of Nuclear Safety (IDNS) hereby submits its comments concerning the above-mentioned petition. IDNS is the lead agency in Illinois for preparing emergency plans for, and (in cooperation with the Illinois Emergency Management Agency) coordinating emergency responses to, accidents at nuclear power plants.

With seven nuclear power plants within its borders, the State of Illinois has a unique perspective on the value and frequency of emergency exercises. Although we have participated in more than forty power plant exercises since the beginning of the REP program in 1980, we continue to consider each one valuable. Regardless of the individual and collective levels of proficiency or technical sophistication, we still find exercises useful in identifying planning, training, or resource needs. In the past, we have often used utility-only and partial-scale exercises to train new personnel, test new facilities, or strengthen our relationship with our nuclear utilities and other agencies. Given the importance of preparedness to overall nuclear safety, we do not believe that annual utility exercises pose an excessive burden. Relaxation of the current requirement is therefore not necessary and should be denied. We appreciate the opportunity to comment on this significant issue.

Sincerely,


Thomas W. Ortigier
Director

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