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Nebraska Public Power District

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April 23, 1993

Mr. David L. Meyer
Chief, Rules and Directives Review Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Draft NRC Generic Letter on Design Basis Information

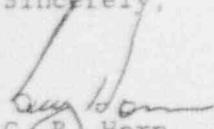
Dear Mr. Meyer:

The Nuclear Regulatory Commission issued a draft Generic Letter, "Availability and Adequacy of Design Basis Information," (reference 58FR15885) for comment on March 24, 1993. The Nebraska Public Power District (the District) endorses the comments submitted by the Nuclear Management and Resources Council (NUMARC) in a letter dated April 2, 1993.

In particular, the District opposes the request for a commitment on the schedule and completion date for the Design Basis Program, with the implication that increased inspections, enforcement action and SALP ratings are contingent upon the response. The District is not necessarily opposed to providing voluntary information on the Design Basis Program that is in progress, even though it is believed that NRC Regional Inspectors are fully aware of the current status. However, the District takes issue with the implication that punitive measures may be taken based upon this voluntary information, without any regulatory requirement or guidance from the NRC as to what constitutes an acceptable schedule or an acceptable Design Basis Program.

In summary, the District endorses the NUMARC comments submitted in the April 2, 1993 letter. The District is opposed to the request for a commitment on the Design Basis Program schedule and is opposed to the potential use of the voluntary information submitted in response to this Generic Letter for punitive purposes.

Sincerely,


G. R. Horn
Nuclear Power
Group Manager

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