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April 26, 1993 C300-93-2137

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

Attention: Docketing and Service Branch

Subject: Licensee Submittal of Data in Computer Readable Form,

Federal Register Volume 58, No. 15

(January 26, 1993 Proposed Rule - Request for Comments)

GPU Nuclear believes the above proposed rule will benefit both the Nuclear Regulatory Commission and the industry, however, additional guidance is necessary. Specific comments are as follows:

The proposed rule should clarify how the data transmittal is to be confirmed.

Currently, all forms (hard copies) must have an authorizing signature and date.

The rule should clarify if an electronic signature on the file/disk is sufficient.

The rule should specify the security requirements for signature. (ie. Is it possible to modify information following electronic signature?)

GPU Nuclear suggests that the NRC pursue an electronic transmission method of data rather than a computer readable disk.

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In the past minor typographical errors could be corrected over the telephone, or explained in a brief comment on a hard copy and initialed. The proposed rule should address how corrections are to be submitted.

Sincerelly,

J. C. Fornicola

Licensing and Regulatory Affairs

Director

/plp

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