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V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

DOCKET

'82 FEB -8 P3:32

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FEB 04 1982

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

DOCKET NUMBER

PETITION RULE PRM-50-30
(46 FR 61484)

Subject: Comments on Proposed Revision to
10CFR Part 50.51

Reference: 46FR61484

Dear Sir:

Philadelphia Electric Company is pleased to offer comments on a proposed change to Section 50.51 which would extend the operating life of nuclear power plants.

Philadelphia Electric Company is of the opinion that the petition's first alternative, providing an expiration date of the Operating License forty years from the date of its issuance, should be adopted. This proposed change would not alter the requirements for safe operation of nuclear plants, but merely restore the actual length of permitted operation to the design life of the components and materials used in plant construction. Decisions made in the construction of Limerick Units 1 and 2 were predicated upon a design life of forty years. Under current rules Limerick Unit 1 would have a permitted operating life of only twenty-nine years, an unjustified penalty if its operating license is received in 1984.

Philadelphia Electric Company urges the Commission to adopt this change to allow the safe, useful, economic operation of nuclear plants for the life to which they were initially designed.

Sincerely,

V. S. Boyer

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Add:
S.M. FELTON

Acknowledged by card...

2/8/82 *emp*