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GULF STATES UTILITIES COMPANY

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Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20655

Gentlemen:

Gulf States Utilities (GSU) is pleased to comment on the petition submitted by Yankee Atomic Electric Company regarding Final Safety Analysis Report (FSAR) revisions (55FR18608 dated 5/3/90).

This petition seeks a change to the current requirements of annual updates to the FSAR to allow submittals within six months following completion of planned refueling outages. GSU supports this change. Submitting updates to the FSAR following planned outages ensures that outage related changes are included in updates in a timely fashion. Since most of the significant plant modifications / changes occur during planned outages, this allows the FSAR revisions to be driven by circumstances, rather than by an arbitrary time schedule. However, GSU would suggest that the proposed rule allow some flexibility to permit licensees to submit more frequent FSAR updates if so desired. In addition, GSU would recommend that the submittal time of the FSAR updates be extended to nine months following an outage. This is a more reasonable time period for preparing an FSAR update.

GSU is confident that the proposed revision of current regulation 10CFR50.71 will significantly benefit both the NRC and the nuclear industry. Furthermore, GSU endorses NUMARC's supporting position on this petition and appreciates the opportunity to provide comments to the NRC.

Sincerely,

W. H. Odell
Manager - Oversight
River Bend Nuclear Group

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