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VIRGINIA POWER

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May 7, 1993

Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555Serial No. 93-269
NL&P/RBP

Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
COMMENTS ON PROPOSED GENERIC LETTER
AVAILABILITY AND ADEQUACY OF DESIGN BASES INFORMATION

Virginia Power has reviewed the Nuclear Regulatory Commission's (NRC's) Federal Register notice dated March 24, 1993 which proposed to issue a generic letter on the availability and adequacy of design bases information. The draft generic letter specifically requests power reactor licensees to describe the programs that are implemented or planned to ensure design bases information for their facilities is correct, accessible, and maintained.

We endorse the NUMARC comments sent separately to the NRC which oppose issuance of the proposed generic communication. Although we are presently and voluntarily conducting a design basis information program, we believe that the generic letter may represent an unjustified regulatory burden with implied backfit implications which does not have any direct connection to public health and safety. We suggest that the NRC apply a 10 CFR 50.109 backfit analysis to this issue, specifically to the effort necessary in describing the extent of any information not presently obtained or providing a rationale for not implementing such a program. Based on our efforts to date, this is substantial and with very limited safety significance.

Very truly yours,

M. L. Bowling, Manager
Nuclear Licensing and Programs