

SECRET  
PETITION RULE PRM 50-58  
YANKEE ATOMIC ELECTRIC COMPANY 58 FR 12339

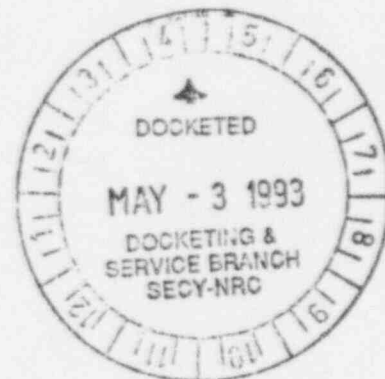
Telephone (508) 779-6711  
TWX 710-380-7619



580 Main Street, Bolton, Massachusetts 01740-1398

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May 3, 1993  
FYC 93-012  
SPS 93-043



Mr. Samuel J. Chilk, Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service Branch

Subject: Virginia Electric and Power Company; Filing of a Petition  
for Rulemaking 58 FR 12339, March 4, 1993

Dear Mr. Chilk:

Yankee Atomic Electric Company (YAEC) appreciates the opportunity to comment on the subject Petition for Rulemaking. YAEC is owner of the Yankee Nuclear Power Station in Rowe, Massachusetts. YAEC's Nuclear Services Division also provides engineering and licensing services to other nuclear power plants in New England.

YAEC fully endorses the comments submitted on behalf of the industry by NUMARC. Adoption of the proposed amendment will result in a substantial reduction of cost and resource impacts to utilities associated with Emergency Preparedness exercises.

In addition, YAEC is concerned that the proposed clause "...The licensee shall take actions necessary to ensure the emergency response capabilities are maintained during the 2-year interval" (58FR12341) is unclear and subject to interpretation. Accordingly, the Staff should provide specific clarification that the phrase "actions necessary" is intended to mean the continual programmatic readiness inherent in all licensee programs as enumerated in the NUMARC comment.

We urge the NRC to undertake the proposed rulemaking as soon as possible.

Sincerely yours,

D. W. Edwards  
Director, Industry Affairs

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