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Vice President  
Nuclear Generation

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April 30, 1993

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. Samuel Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
ATTN: Docketing & Service Branch

RE: Virginia Electric and Power Company; Filing of a Petition for Rulemaking, 58 Fed. Reg. 12339 (1993)

Dear Mr. Chilk:

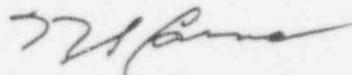
These comments are submitted by Niagara Mohawk Power Corporation in response to the above referenced notice and invitation to comment on Virginia Electric and Power Company's petition for rulemaking to amend 10 C.F.R. Part 50, Appendix E, Section IV, F.2. We support the petition and believe that the proposed clarification to Appendix E is warranted.

Power reactor licensee effectiveness in emergency planning has improved steadily to the point where annual observed exercises no longer provide a significant benefit, let alone a benefit commensurate with their cost in dollars and diverted resources. For the nuclear power industry, over the past few years, emergency planning exercise deficiencies have largely been absent or narrowly focussed. Observations during periodic exercises have been generally minor, and there is no indication that such observations would interfere with the overall implementation of the emergency plan.

We agree that adequate safeguards exist to assure that no deterioration of emergency planning effectiveness on the part of any licensee occurs during the proposed two-year interval for exercises. As stated, the proposed change requires licensees to take appropriate action to maintain emergency response capabilities during this interval. Periodic drills which maintain emergency plan effectiveness would also continue to be conducted.

We also agree that the estimated cost savings would amount to at least \$200,000 and that hundreds of man-hours of effort could be redirected from exercise scenario development and implementation to substantive improvements of overall plant safety. The redirection of resources could provide a net safety benefit.

Respectfully submitted,



N. S. Carns  
Vice President - Nuclear Generation

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