

PDR

Southern Nuclear Operating Company  
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Southern Nuclear Operating Company  
*the southern electric system*

July 30, 1993

Docket Nos. 50-348  
50-364

Mr. Samuel J. Chilk  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Docketing and Service Branch

Regulatory Review Group; Publication  
of Report to Executive Director  
(58 Federal Register 29012 on May 18, 1993)

Dear Mr. Chilk:

Southern Nuclear Operating Company has reviewed the publication of the Regulatory Review Group's report to the Executive Director for Operations, which appeared in the Federal Register on May 18, 1993. Southern Nuclear Operating Company is in agreement with the NUMARC comments, which are to be provided to the NRC.

In reference to NUMARC's comments on Volume Four, we recognize it is not NUMARC's intent to provide detailed, critical comments on specific methodologies. However, this should not be taken to mean that the criteria is endorsed. Southern Nuclear Operating Company feels that certain specific criteria will need to be addressed in more detail. For example, there is a general concern over implementation of a screening value of  $3E-2$  for pre-initiator human events. There are an infinite number of conceivable pre-initiator human actions, and only a few are usually modeled.

Additionally, Southern Nuclear Operating Company believes that a successful conclusion of this effort is extremely important if there is to be a viable nuclear option in the coming years. Operations and Maintenance costs rose at alarming rates during the 1980s and early 1990s, primarily due to new regulations and licensee commitments. Many of these commitments resulted in significant cost increases to the nuclear industry but had little to no safety benefit. Both the NRC and the licensees must put into place a more disciplined process for evaluating the benefits of new regulations and commitments. Performance-based initiatives should be considered whenever

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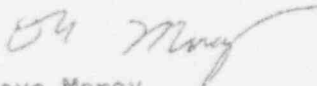
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possible, old regulations and commitments which have little to no overall benefit to public health and safety need to be eliminated. The Regulatory Review Group initiative provides an important framework for the initiation of such an effort.

Should you have any questions, please advise.

Respectfully submitted,  
SOUTHERN NUCLEAR OPERATING COMPANY

  
Dave Morey  
Vice President  
Farley Project

DNM/DSC

cc: Southern Nuclear Operating Company  
R. D. Hill, Plant Manager

U.S. Nuclear Regulatory Commission, Washington, DC  
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U.S. Nuclear Regulatory Commission, Region II  
S. D. Ebnetter, Regional Administrator  
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