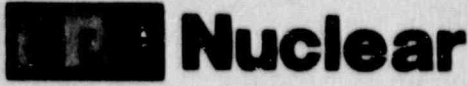


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October 11, 1990  
C311-90-2132  
C320-90-239

Mr. Samuel J. Chilk,  
Secretary of the Commission  
Att: Docketing and Service Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Chilk:

Subject: Proposed Rule 10CFR54  
Nuclear Power Plant License Renewal

Reference: 55 Fed Reg. 29043 (July 17, 1990)

In response to the request of the U. S. Nuclear Regulatory Commission (NRC) for comments on the proposed rule referenced above GPU Nuclear Corporation (GPUN) is pleased to provide the following comments.

First, we wish to express our support of and agreement with the comments being provided to you by the Nuclear Management and Resource Council, Inc. (NUMARC). NUMARC serves to represent the nuclear power industry as a whole and hence its comments should be given appropriate weight.

Clearly, the energy needs of our nation command those actions necessary to make nuclear power plant life extension a reality. The proposed rule on Nuclear Plant License Renewal serves the purpose of providing a viable alternative option when considering the energy sources available for future electric power generation. This is especially true in a volatile world having considerable uncertainty with respect to the future supply of crude oil.

Of specific concern to GPUN is the wording of the proposed rule which: (1) defines Current Licensing Bases (CLBs); (2) requires a "compilation of such documentation making up the CLBs"; and (3) mandates that CLBs become a condition of the renewed Operating License. GPUN strongly believes that the current licensing basis, which we would define as a "Licensing Envelope," is fully contained in a specific group of documents which make up the envelope.

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This envelope, in our opinion, is made up of the following limited set of documents:

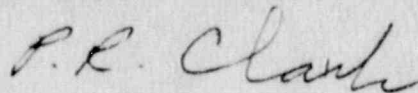
- The plant Operating License, and its Appendix A Technical Specifications, along with any other "Conditions of Operation" or Orders impacting upon the Operative License.
- The Updated FSAR as required by 10CFR50.71e
- The Fire Hazards Analysis Report
- The Operational Quality Assurance Plan
- The Emergency Plan
- The Security and Safeguards Plans
- The other Plans and/or Programs which serve to meet underlying regulations, e.g., Equipment Qualification pursuant to 10CFR50.49; Operator Training and Requalification per 10CFR55, etc.

This Licensing Envelope is fully adequate now, with the exception of age-related degradation considerations or impact of changing regulations, and will be adequate in the future for license renewal in providing continued reasonable assurance that the health and safety of the public is protected. This protection shall be afforded to the public without need for additional compilation or attachment of CLBs to the renewed Operating License, as a "condition of the license," because the Licensing Envelope includes all other underlying regulatory requirements outside of the proposed 10CFR54.

Furthermore, it is a licensee's obligation to assure the NRC and themselves of continued compliance through good management practices such as the maintenance of Licensing Action Item and Commitment Tracking Systems. These systems and corporate procedures ensure that corporate and plant programs, policies, and procedures continue to implement NRC's regulations with a high degree of success. In addition, NRC's existing policies, practices and procedures assure compliance with its regulations during the term of the renewed Operating License via NRC's continued oversight functions. Hence, the proposed requirement to compile Current Licensing Bases is unnecessary, would be extremely burdensome on licensees and would represent an inappropriate diversion of resources prior to and during the proceedings required for license renewal.

We appreciate the opportunity to comment on the proposed rule; we hope you find our specific comments, in addition to NUMARC's comments useful in further refinement of the rule.

Sincerely yours,



P. R. Clark,  
President and  
Chief Executive Officer