

MERLIN GERIN, INC.

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Secretary of the Commission
U.S. NUCLEAR REGULATORY COMMISSION
Washington, DC 20555

November 5, 1990

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DOCKETING AND SERVICE BRANCH

Dear Mr. Secretary:

I am writing to express support for the Nuclear Regulatory Commission's proposed rule on nuclear power plant license renewal (10 CFR Parts 2, 50 and 54, RIN 3150-AD04). This is an important program for the Commission and will serve to help ensure an adequate, reliable support of affordable electricity for the American public.

It is clear that when Congress enacted the Atomic Energy Act in 1954 the 40 year license term for nuclear power plants was based solely on financial concerns and capital amortization, not safety or environmental concerns. The Act specifically provides for license renewals and at a time when utilities are having difficulty siting and constructing and type of new generating facility, retiring safe, reliable nuclear power plants simply because a license expires does not make sense.

In addition, plant license renewal appears to have potential for major consumer benefits. Renewing the license of a typical nuclear plant for 20 years could save consumers up to \$1 billion by avoiding the cost of new power plant construction according to the Department of Energy, Nationwide, the savings could reach \$350 billion.

Also, nuclear power plants do not contribute to the problem of air pollution, acid rain, or the "greenhouse effect"; qualities that are in harmony with the sweeping changes and restrictions on electrical generation expected in upcoming revisions to the Clean Air Act.

In closing, I want to reiterate my support for the proposed rule and applaud the NRC's efforts in developing this important policy initiative.

Sincerely,

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