

STONE & WEBSTER ENGINEERING CORPORATION

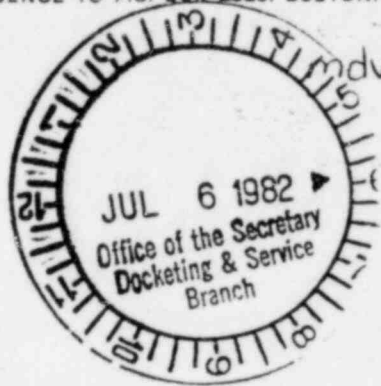


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June 30, 1982

Dr. N.J. Palladino
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKET NUMBER
PROPOSED RULE **PR-Safety Goals**
(45 FR 71023) 154

Dear Chairman Palladino:

The NRC Proposed Policy Statement on Safety Goals for Nuclear power plants has been previously reviewed and commented on by the Stone & Webster Engineering Corporation in our May 18, 1982 letter to the Secretary of the Commission.

The proposed policy statement did not contain a discussion of how the safety goals should be implemented in the regulatory process. In our letter, we stated that the final goals should be used for a trial period. There are many important questions related to implementation of safety goals that are as important as the safety goals themselves. Implementation details are dependent on the goals adopted. For these reasons, and because of the complexity of these matters, it is our desire to have an opportunity to participate in implementation considerations.

The purpose of this letter is to state our view of the need for the publication of safety goal implementation provisions for public comment prior to their adoption. This will also give further opportunity for comment on the revisions the Commission will make to the proposed safety goals.

Very Sincerely,

R. Bradbury
Chief Licensing Engineer

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