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DOCKETING & SERVICE
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United States Nuclear Regulatory Commission
Washington, DC 20555

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ATTENTION: Secretary of the Commission
Docketing and Service Branch

DOCKET NUMBER
PROPOSED RULE PR-50
(47 FR 47019)

SUBJECT: Comments on Proposed Rule "NUREG-0906"

REFERENCES: (a) 47 Federal Regulation 47019, dated October 22, 1982
(b) Generic Letter No. 82-20, dated October 26, 1982

Gentlemen:

Beaver Valley Power Station Unit No. 2 welcomes the opportunity to comment on the proposed rule (NUREG-0906) "Guidance for Implementation of 10CFR50.34(g)" as presented in Reference (a) and (b). The proposed rule was developed because of the published final rule in the Federal Register (47FR11651), titled "Conformance with the Standard Review Plan (SRP)", requiring certain applicants for nuclear power plant operating licenses docketed after May 17, 1982, to include an evaluation of the differences between the proposed facility and the SRP acceptance criteria in their application. In Reference (a), it was stated that NUREG-0906 provides guidance for describing the identified differences from the SRP. Reference (b) stated that NUREG 0906 is intended as an interim measure until Regulatory Guide 1.70 is revised to reflect the new rule at which time NUREG-0906 would be incorporated into Regulatory Guide 1.70. Reference (b) also listed the major features of NUREG-0906. After reviewing References (a) and (b) Beaver Valley Power Station Unit No. 2 (BVPS-2) submits the following comments on NUREG-0906 for consideration:

1. The NUREG is vague with regard to what information contained in the SAR is required to be evaluated against the SRP. The NUREG suggests that all differences between, analytical techniques, and procedural methods proposed in the FSAR be compared with the SRP acceptance criteria. This would appear to be a subset of the total FSAR content.
2. The suggestion that alternative methods of complying with the regulations be discussed in the affected SAR section is misleading. In practice, it is found that many acceptance criteria identified in the SRP are not applicable to that SRP section and should be discussed elsewhere (NUREG-0737 is a good example). By placing a discussion of reasons for not meeting, such SRP criteria in the corresponding SAR section, the applicant will be providing many irrelevant discussions in various SAR sections. Thus, strict conformance with NUREG-0906 would

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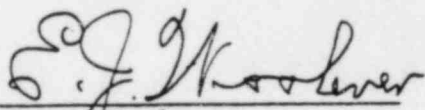
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degrade the quality of SAR's. NUREG-0906 should suggest that a non-applicable SRP acceptance criteria be addressed in the Section 1.8 discussion or table.

We appreciate the opportunity to comment on the proposed rule and trust that you will find them beneficial. We remain available to discuss these comments with you.

DUQUESNE LIGHT COMPANY

By 
E. J. Woolever
Vice President

SDH/wjs

cc: Mr. G. Walton, NRC Resident Inspector
Ms. L. Lazo, Project Manager