

YANKEE ATOMIC ELECTRIC COMPANY

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PROPOSED RULE PR 51
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Mr. Donald P. Cleary
Office of Nuclear Regulatory Research
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Yankee Atomic Electric Company Comments - 10 CFR Part 51,
Environmental Review for Renewal of Operating Licenses -
Public Meeting Request for Comments (59FR2542, January
18, 1994)

Dear Mr. Cleary:

Yankee Atomic Electric Company (YAEC) appreciates the opportunity to provide comments on the subject comment opportunity. Yankee owns the nuclear power plant in Rowe, Massachusetts. Yankee Nuclear Services Division (YNSD) also provides engineering and licensing services for other nuclear power plants in the northeast, including Vermont Yankee, Maine Yankee and Seabrook. Yankee Rowe was the lead PWR in the original EPRI/DOE Lead Plant Program for License Renewal and Yankee has had a significant role in the development of both the License Renewal Rule (10 CFR Part 54) and its environmental rule companion.

Yankee has confirmed, just yesterday that, although the focus of the subject Federal Register notice was the three public meetings with the states on options to address need for power and alternatives, the entire substance of the private negotiations between NRC, CEQ and EPA discussed in SECY-93-032 is open for comment. This places an entirely different character on the response to 59FR2542 due March 4, 1994. We had assumed that, since the fundamental approach and use of the GEIS had changed so drastically and, since the revised GEIS was not yet available, that a second comment opportunity would be afforded the interested public when the GEIS became available. This apparently is not NRC's intention.

The entire approach characterized by Chairman Selin as "...an outstanding example of how we can save licensees a huge amount of time and money without compromising public interest" (NRC Staff briefing on Generic Environmental Impact Statement for License

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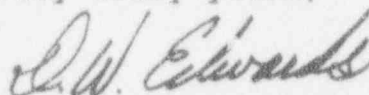
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Renewal and Proposed Part 51 Rule, July 19, 1991) has reverted to the old, costly, time-consuming and fruitless process of repetitive and duplicative exercises of the full Environmental Impact Statement process plant by plant and with no issues conclusively resolved via rulemaking. This major reversal by the staff deserves considerable thought and comment which will be difficult if not impossible to complete by the March 4 deadline.

As a consequence, Yankee respectfully requests a three week extension of the comment deadline to March 25, 1994.

Thank you for your time and attention.

Very truly yours,



Donald W. Edwards
Director, Industry Affairs

DWE/sf