

## Pennsylvania Power & Light Company

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Secretary of the Commission U.S. Nuclear Regulatory Commission Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION PROPOSED NUCLEAR POWER PLANT LICENSE RENEWAL RULE - RESPONSE TO REQUEST FOR COMMENTS PLA-3462 FILES A5-11/A17-11

Docket Nos. 50-387 and 50-388

Gentlemen:

These comments are submitted by Pennsylvania Power & Light Company in response to the NRC's request (reference 55FR29043, dated July 17, 1990).

We commend the Nuclear Regulatory Commission for its timely leadership and responsiveness to the national need for a clear nuclear power plant license renewal policy.

The Proposed Rule, with enhancements recommended by NUMARC, will provide a more stable basis for utility planning and development of future electric generation facilities.

PP&L Comment No. 1:

PP&L endorses the NUMARC comments on the Proposed Rule, as submitted by Mr. Joe F. Colvin. We believe that the incorporation of these comments will strengthen the rule and improve its implementation.

The NUMARC comments represent the collective efforts of a large number of industry experts who have extensive experience in nuclear power plant design, construction, operation, maintenance, licensing and quality assurance.

## PP&L Comment No. 2:

We concur with the NRC determination that a facility's Current Licensing Basis should continue through the license renewal period, except for such changes as may be necessary to maintain an acceptable level of safety. The NRC regulatory oversight

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activities, supported by continued analysis of major safety issues under existing regulatory processes are adequate to ensure the protection of public health and safety.

PP&L appreciates the opportunity to review the Proposed License Renewal Rule.

Very truly yours,

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H. W. Keiser

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cc: NRC Document Control Desk (original)
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