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RICHMOND, VIRGINIA 23261

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R. H. LEASBURG
VICE PRESIDENT
NUCLEAR OPERATIONS

October 8, 1982

DOCKET NUMBER

PROPOSED RULE

PR - 50

(47 FR 33980)

Serial No. 573
NO/RMT:acm

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D. C. 20555

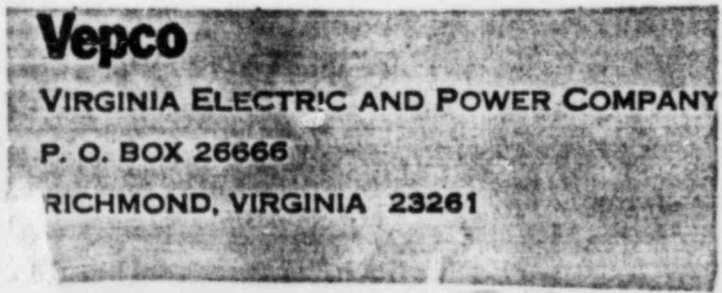
Dear Sir:

The enclosed comments are being forwarded on proposed rulemaking concerning establishing and implementing of controls by nuclear power plant licensees designed to assure that personnel with unescorted access to protected areas are not under the influence of drugs or alcohol or are otherwise unfit for duty (FR DOC.82-21209).

Very truly yours,

R. H. Leasburg

Enclosure



DS10
add: Ellis Merschhoff
5650 NW

8210220373 821008
PDR PR
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10/21/82 emp

Overall Comments:

VEPCO does not concur in the need for a rule with respect to "PERSONNEL WITH UNESCORTED ACCESS TO PROTECTED AREAS; FITNESS FOR DUTY."

The proposal is already partially covered in the security requirements with respect to unescorted access to protected areas. Additional guidance would appropriately be put in ANS 3.3.

Should the decision be made to make a rule in spite of industry opposition, the rule should apply to NRC personnel and there should not be specific blood alcohol limits.