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USNRC

October 4, 1982

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Georgia Power
the southern electric system

Power Generation Department

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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

NED-82-266

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ATTENTION: Docketing and Service Branch

DOCKET NUMBER
PETITION RULE PRM-5033
47 FR 2925

Subject: National Emergency Management Association
Petition for Rulemaking Emergency Preparedness
Docket No. PRM-50-33

Gentlemen:

On July 6, 1982, the U. S. Nuclear Regulatory Commission ("Commission") published in the Federal Register, Vol. 47, No. 129, a notice of receipt of petition for rulemaking from the National Emergency Management Association (Petitioner). In the notice the Commission stated that it had received a petition for rulemaking dated March 17, 1982, in which the Petitioner had requested the Commission to modify its emergency preparedness regulations in 10 CFR 50 to reduce the frequency of emergency exercises involving state and local government. The Petitioner states that the current requirement for an annual exercise at each nuclear power plant site within a state is imposing an "impossible burden" on state resources.

Georgia Power Company agrees. Exercising a licensee's emergency plan (with full state and local involvement) on a less frequent basis (e.g., biennial) will provide sufficient planning practice while reducing the burden on state and local governments. Particularly, a severe burden is being placed on those states having several operating nuclear power plants within or close to their borders. Georgia Power Company supports the concept of reducing the frequency of emergency exercise involving state and local government and recommends that the Commission initiate rulemaking to achieve this result.

Sincerely,

L. T. Guwa
Chief Nuclear Engineer

DLT/mb

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Acknowledged by 10/15/82 emg