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COMMENTS OF OHIO CITIZENS FOR RESPONSIBLE ENERGY (OFFICE OF SECRETARY OF ENERGY) ON PROPOSED RULE, "CODES AND STANDARDS FOR NUCLEAR PLANTS; SUBSECTION IWE AND SUBSECTION IWL," 59 FED. REG. 979 (JANUARY 7, 1994)

OCRE supports this proposed rule. The NRC has thoroughly justified the need for this rule to ensure the adequate protection of the public health and safety.

However, OCRE is concerned that the NRC does not plan to require licensees to submit the Subsection IWE and Subsection IWL portions of the ISI plans for NRC approval. This sends the wrong message, the message that the NRC is not really serious about containment ISI. Given the fact that over one-third of operating containment structures have experienced degradation, and that licensee programs have not been effective in detecting such degradation, then the NRC should not optimistically assume that adopting this rule, without also requiring NRC review and approval of the ISI plans, will solve the problem.

Respectfully submitted,



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